

**EXHIBIT A**

**EXHIBIT A**

Chart Summarizing the Unauthorized Claims

	<b>Claim Number</b>	<b>Claimant Identified on Claim Form</b>	<b>Building/Job for Which Claim was Filed</b>	<b>Building or Job as Claimant</b>	<b>Claimant Not on S&amp;R's 2019 Statement</b>	<b>Claimant on 2019 Statement but Improper basis for Representation</b>
1	6736 <b>Exhibit B</b>	"McCormick Place"	"2301 South Lake Shore Drive Chicago, Illinois 60616 United States"	X	X	
2	6734 <b>Exhibit C</b>	"Northwest Community Hospital"	"800 W. Central Road - Arlington Heights, IL United States"		X	
3	6726 <b>Exhibit D</b>	"Harvard Public Health (Harv Vanguard Med. Asso)"	"23 Miner Street Boston, MA 02215 United States"		X	
4	6661 <b>Exhibit E</b>	"American Medical Association Building"	515 North State Street Chicago, IL United States	X		X
5	6672 <b>Exhibit F</b>	"Employer's Mutual Job"	"Wausau WI United States WI"	X		X
6	6721 <b>Exhibit G</b>	"Maryland Casualty Co."	"3910 Keswick Road Baltimore, MD 21221 United States"		X	
7	6701 <b>Exhibit H</b>	"Pilot Life Insurance Company"	"100 N. Green Street #M Greensboro, NC 27401 United States"		X	
8	11591 <b>Exhibit I</b>	"Laborer's 310 Union Office Building"	"3250 Euclid Avenue Cleveland, OH 44115 United States"	X		X
9	6630 <b>Exhibit J</b>	"The Greater Fort Wayne Chamber of Commerce"	"835 Ewing Street Fort Wayne, IN 46802 United States"			X

	Claim Number	Claimant Identified on Claim Form	Building/Job for Which Claim was Filed	Building or Job as Claimant	Claimant Not on S&R's 2019 Statement	Claimant on 2019 Statement, but Improper basis for Representation
10	10873 Exhibit K	"Byars Machine Company"	"Laurens, SC United States"			x

**EXHIBIT B**



**WR Grace**  
Property Damage  
Index Sheet

SR00000504

Claim Number: 00006736

Receive Date: 03/27/2003

**Multiple Claim Reference**

Claim Number \_\_\_\_\_

- ☐ MMPOC Medical Monitoring Claim Form  
☐ PDPOC Property Damage  
☐ NAPO Non-Asbestos Claim Form  
☐ Amended

Claim Number \_\_\_\_\_

- ☐ MMPOC Medical Monitoring Claim Form  
☐ PDPOC Property Damage  
☐ NAPO Non-Asbestos Claim Form  
☐ Amended

**Attorney Information**

Firm Number: 00131

Firm Name: Speights & Runyan

Attorney Number: 00168

Attorney Name: Amanda G Steinmeyer

Zip Code: 29924

Cover Letter Location Number: SR00000504

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	<input type="checkbox"/> Other Attachments
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
	<input checked="" type="checkbox"/> Other Attachments	
Other	<input type="checkbox"/> Non-Standard Form <input type="checkbox"/> Amended <input type="checkbox"/> Post-Deadline Postmark Date	

**PART 1: CLAIMING PARTY INFORMATION**

NAME:

MCCORMICK PLACE

Name of individual claimant (first, middle and last name) or business claimant

SOCIAL SECURITY NUMBER (Individual Claimants):

(last four digits of SSN)

F.E.I.N. (Business Claimants)

Other names by which claiming party has been known (such as maiden name or married name):

First

MI

Last

First

MI

Last

GENDER: ☐ MALE ☐ FEMALE

Mailing Address:

Street Address

City

Country

State

Zip Code

(Province) (Postal Code)

**PART 2: ATTORNEY INFORMATION**

The claiming party's attorney, if any (You do not need an attorney to file this form):

Law Firm Name:

SPEIGHTS &amp; RUNYAN

Name of Attorney:

AMANDA

First

MI

Last

G STEINMEYER

Mailing Address:

P O BOX 685 - 200 JACKSON AVENUE EAST

Street Address

HAMPTON

City

SC

State

29924

Zip Code

(Province) (Postal Code)

Telephone:

(803) 943-4444

Area Code

REC'D MAR 27 2003

WR Grace PD.4.13.641  
00006738  
SR=504

9276101

SERIAL #

**PART 3: PROPERTY INFORMATION****A. Real Property For Which A Claim Is Being Asserted**

1. What is the address of the real property for which a claim is being asserted (referred to herein as "the property")?

2301 S. LAKE SHORE DRIVE

Street Address

CHICAGO

City

IL

State

60616

Zip Code

UNITED STATES

Country

(Province) (Postal Code)

2. Are you completing an Asbestos Property Damage Proof of Claim Form for any other real property other than the one listed at "1" above?

☐ Yes ☒ No

3. Do you currently own the property listed in Question 1, above?

☒ Yes ☐ No

4. When did you purchase the property?

- 1969

Month Day Year

5. What is the property used for (check all that apply)

☐ Owner occupied residence☐ Residential rental☒ Commercial☐ Industrial Specify:☐ Other Specify:

6. How many floors does the property have?

UNKNOWN

7. What is the approximate square footage of the property?

UNKNOWN

8. When was the property built?

☐ Before 1969☒ 1969 - 1973☐ After 1973

9. What is the structural support of the property?

☐ Wood frame☒ Structural concrete☐ Brick☐ Steel beam/girder☐ Other Specify:

10. Have you or has someone on your behalf completed any interior renovations on the property which affected any asbestos on the property?

☒ Yes ☐ No

9276102

SERIAL #

**A. Real Property For Which A Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes    ☐ No

If yes, please specify the dates and descriptions of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

**B. Claim Category**

12. For which category are you making a claim on the property?

☒ Category 1: Allegation with respect to asbestos from a Grace product in the property

☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

- If you checked Category 1 in question 12, complete section C.
- If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☐ Monokote-3 fireproofing insulation

☒ Other Specify: SURFACE TREATMENT

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

--	--	--	--

Year

☒ I did not install the product(s)

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

1	9	6	9
---	---	---	---

Year

☐ Don't know.

9276103

SERIAL #



16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☐ Yes ☒ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

SEE ATTACHED

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

2003

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ATTACHED

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

2003

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ATTACHED

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ATTACHED

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

9276104

SERIAL #

25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

Year	Description
	VARIOUS YEARS, NUMEROUS PROJECTS
Year	Description
Year	Description

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes ☐ No

**If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

SEE ATTACHED

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes ☐ No NOT APPLICABLE

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Year	Company/Individual	VARIOUS YEARS, NUMEROUS SAMPLES
	Type of testing:	
Year	Company/Individual	
	Type of testing:	
Year	Company/Individual	
	Type of testing:	

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes ☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Year	Description
	AFFECTED BY NUMEROUS CUSTODIAL AND MAINTENANCE ACTIVITIES AND RENOVATIONS.
Year	Description
Year	Description

9276105

SERIAL #

W.R. Grace & Co.

Asbestos Property Damage

(9276)

Proof of Claim Form

Missing Page

1 2 3 4 5

⑥ ⑦ ⑧ 9 10

**PART 4: ASBESTOS LITIGATION AND CLAIMS****A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)
2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

**B. LAWSUITS**

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption ANDERSON MEMORIAL HOSPITAL, ON BEHALF OF ITSELF & OTHERS SIMILARLY SITUATED  
V. W.R. GRACE & COMPANY ET AL
- b. Court where suit originally filed: HAMPTON SC Docket No.: 92CP25279  
County/State
- c. Date filed: 12 - 23 - 1992  
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:  -  -   
                             Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
                             Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
                             Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
                             Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
                             Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
                             Name of Entity

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.

   -  -   
                             Month Day Year

SIGNATURE OF CLAIMANT AMANDA G. STEINMEYER

\*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both.  
 18 U.S.C. §§ 152 & 3571.

9276110

SERIAL #

**Response to Question 17:** The Claimant understands Question 16 to ask for the existence of historical documents demonstrating that Grace's asbestos-containing product was purchased and/or installed in the property. As indicated in its response, the Claimant does not know of any such specific documents at this time. The Claimant assumes that there would have been a large number of original construction documents, including drawings and specifications, which, if not destroyed in the ordinary course of business, might possibly be found at a number of storage facilities, including those under the control of various persons involved with the design and construction of the property and the sale and installation of products in the property. In addition, this claim is based upon an assertion that debtors manufactured or sold products containing asbestos that are or were present in this property and/or all other theories of liability that are allowed by law including but not limited to conspiracy and fraudulent transfer. Moreover, Claimant believes Grace itself may be in control of supporting documentation, or other supporting information, regarding whom Grace or their salesmen sold their products to, and Claimant may need documentation or discovery from Grace on this issue. Claimant does not waive any rights, but is willing to discuss this matter with Grace if it believes Claimant's response is insufficient.

**Response to Question 19:** Refer to Question 17 Response.

**Response to Question 21:** Refer to Question 17 Response.

**Response to Question 23:** Taken literally, Question 22 seeks all documents relating to not only the removal, enclosure and encapsulation, but operations and maintenance documents which attempt to contain contamination from Grace's product. There is insufficient time to locate all such documents that might be called for in Question 22. To the extent that such documents have not been destroyed in the ordinary course of business, they may exist in the files or dead storage of many persons involved with such projects. Before undertaking an effort of this magnitude, Claimant would like to work with Grace to understand exactly what it is that Grace is seeking and whether Claimant can easily accommodate that request.

**Response to Question 27:** As Claimant understands Question 26, Grace seeks all documents of every kind and description not only related to the testing or sampling for the presence of asbestos, including samples taken during any abatement projects, as well as all samples related to any other particulates, including, by way of example only, all silicates, lead dust and other metal dust, beta glucans, etc. Such documents, to the extent they exist, may not only be in the possession of Claimant, but a number of third party contractors and/or consultants as well. Before undertaking the search for all of these documents, Claimant wishes to discuss this matter with Grace and obtain a clarification.

**EXHIBIT C**



**WR Grace**  
Property Damage  
Index Sheet

SR00000504

Claim Number: 00006734

Receive Date: 03/27/2003

**Multiple Claim Reference**

Claim Number \_\_\_\_\_

- ☐ MMPOC Medical Monitoring Claim Form  
☐ PDPOC Property Damage  
☐ NAPO Non-Asbestos Claim Form  
☐ Amended

Claim Number \_\_\_\_\_

- ☐ MMPOC Medical Monitoring Claim Form  
☐ PDPOC Property Damage  
☐ NAPO Non-Asbestos Claim Form  
☐ Amended

**Attorney Information**

Firm Number: 00131

Firm Name: Speights &amp; Runyan

Attorney Number: 00168

Attorney Name: Amanda G Steinmeyer

Zip Code: 29924

Cover Letter Location Number: SR00000504

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	<input type="checkbox"/> Other Attachments
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
	<input checked="" type="checkbox"/> Other Attachments	
<b>Other</b>	<input type="checkbox"/> Non-Standard Form <input type="checkbox"/> Amended <input type="checkbox"/> Post-Deadline Postmark Date	





**PART 3: PROPERTY INFORMATION****A. Real Property For Which A Claim Is Being Asserted**

1. What is the address of the real property for which a claim is being asserted (referred to herein as "the property")?

800 W. CENTRAL ROAD

Street Address

ARLINGTON HEIGHTS

City

IL

State

Zip Code

UNITED STATES

Country

(Province) (Postal Code)

2. Are you completing an Asbestos Property Damage Proof of Claim Form for any other real property other than the one listed at "1" above?

☐ Yes ☒ No

3. Do you currently own the property listed in Question 1, above?

☒ Yes ☐ No

4. When did you purchase the property?

- 1963

Month Day Year

5. What is the property used for (check all that apply)

☐ Owner occupied residence☐ Residential rental☒ Commercial☐ Industrial Specify:☐ Other Specify:

6. How many floors does the property have?

UNKNOWN

7. What is the approximate square footage of the property?

UNKNOWN

8. When was the property built?

☒ Before 1969☐ 1969 - 1973☐ After 1973

9. What is the structural support of the property?

☐ Wood frame☒ Structural concrete☐ Brick☐ Steel beam/girder☐ Other Specify:

10. Have you or has someone on your behalf completed any interior renovations on the property which affected any asbestos on the property?

☒ Yes ☐ No

9276102

SERIAL #

**A. Real Property For Which A Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

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Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes      ☐ No

If yes, please specify the dates and descriptions of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

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Year

Description

**B. Claim Category**

12. For which category are you making a claim on the property?

☒ Category 1: Allegation with respect to asbestos from a Grace product in the property

☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

- If you checked Category 1 in question 12, complete section C.
- If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☐ Monokote-3 fireproofing insulation

☒ Other      Specify: SURFACE TREATMENT

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

--	--	--	--

Year

☒ I did not install the product(s)

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

1	9	6	3
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Year

☐ Don't know.

9276103

SERIAL #

16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☐ Yes ☒ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

SEE ATTACHED

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

2003

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ATTACHED

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

2003

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ATTACHED

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ATTACHED

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

9276104

SERIAL #

25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

Description **VARIOUS YEARS, NUMEROUS PROJECTS**  
Year

Description   
Year

Description   
Year

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes

☐ No

**If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

**SEE ATTACHED**

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes

☐ No NOT APPLICABLE

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Company/Individual **VARIOUS YEARS, NUMEROUS SAMPLES**  
Year

Type of testing:

Company/Individual   
Year

Type of testing:

Company/Individual   
Year

Type of testing:

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes

☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Description **AFFECTED BY NUMEROUS CUSTODIAL AND MAINTENANCE ACTIVITIES AND RENOVATIONS.**  
Year

Description   
Year

Description   
Year

W.R. Grace & Co.

Asbestos Property Damage

(9276)

Proof of Claim Form

Missing Page

1 2 3 4 5

⑥ ⑦ ⑧ 9 10

**PART 4: ASBESTOS LITIGATION AND CLAIMS****A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No  
☒ Yes - lawsuit  
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No  
☒ Yes - lawsuit  
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

**B. LAWSUITS**

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption ANDERSON MEMORIAL HOSPITAL, ON BEHALF OF ITSELF & OTHERS SIMILARLY SITUATED  
V. W.R. GRACE & COMPANY ET AL
- b. Court where suit originally filed: HAMPTON SC Docket No.: 92CP25279  
County/State
- c. Date filed: 12 - 23 - 1992  
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #J

**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.

   -  -   
Month Day Year  
 SIGNATURE OF CLAIMANT AMANDA G. STEINMEYER

\*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both.  
 18 U.S.C. §§ 152 & 3571.



**Response to Question 17:** The Claimant understands Question 16 to ask for the existence of historical documents demonstrating that Grace's asbestos-containing product was purchased and/or installed in the property. As indicated in its response, the Claimant does not know of any such specific documents at this time. The Claimant assumes that there would have been a large number of original construction documents, including drawings and specifications, which, if not destroyed in the ordinary course of business, might possibly be found at a number of storage facilities, including those under the control of various persons involved with the design and construction of the property and the sale and installation of products in the property. In addition, this claim is based upon an assertion that debtors manufactured or sold products containing asbestos that are or were present in this property and/or all other theories of liability that are allowed by law including but not limited to conspiracy and fraudulent transfer. Moreover, Claimant believes Grace itself may be in control of supporting documentation, or other supporting information, regarding whom Grace or their salesmen sold their products to, and Claimant may need documentation or discovery from Grace on this issue. Claimant does not waive any rights, but is willing to discuss this matter with Grace if it believes Claimant's response is insufficient.

**Response to Question 19:** Refer to Question 17 Response.

**Response to Question 21:** Refer to Question 17 Response.

**Response to Question 23:** Taken literally, Question 22 seeks all documents relating to not only the removal, enclosure and encapsulation, but operations and maintenance documents which attempt to contain contamination from Grace's product. There is insufficient time to locate all such documents that might be called for in Question 22. To the extent that such documents have not been destroyed in the ordinary course of business, they may exist in the files or dead storage of many persons involved with such projects. Before undertaking an effort of this magnitude, Claimant would like to work with Grace to understand exactly what it is that Grace is seeking and whether Claimant can easily accommodate that request.

**Response to Question 27:** As Claimant understands Question 26, Grace seeks all documents of every kind and description not only related to the testing or sampling for the presence of asbestos, including samples taken during any abatement projects, as well as all samples related to any other particulates, including, by way of example only, all silicates, lead dust and other metal dust, beta glucans, etc. Such documents, to the extent they exist, may not only be in the possession of Claimant, but a number of third party contractors and/or consultants as well. Before undertaking the search for all of these documents, Claimant wishes to discuss this matter with Grace and obtain a clarification.

**EXHIBIT D**

**WR Grace**

SR00000504

Property Damage

Index Sheet

Claim Number: 00006726

Receive Date: 03/27/2003

**Multiple Claim Reference**

Claim Number \_\_\_\_\_

- ☐ MMPOC Medical Monitoring Claim Form
- ☐ PDPOC Property Damage
- ☐ NAPO Non-Asbestos Claim Form
- ☐ Amended

Claim Number \_\_\_\_\_

- ☐ MMPOC Medical Monitoring Claim Form
- ☐ PDPOC Property Damage
- ☐ NAPO Non-Asbestos Claim Form
- ☐ Amended

**Attorney Information**

Firm Number: 00131

Firm Name: Speights &amp; Runyan

Attorney Number: 00168

Attorney Name: Amanda G Steinmeyer

Zip Code: 29924

Cover Letter Location Number: SR00000504

**Attachments  
Medical Monitoring**

- ☐ TBD
- ☐ TBD
- ☐ TBD
- ☐ TBD
- ☐ TBD

**Attachments  
Property Damage**

- ☐ TBD
- ☐ TBD
- ☐ TBD
- ☐ TBD
- ☐ TBD
- ☒ Other Attachments

**Non-Asbestos**

- ☐ Other Attachments

**Other**

- ☐ Non-Standard Form
- ☐ Amended
- ☐ Post-Deadline Postmark Date

HARVARD PUBLIC HEALTH (HARV VANGUARD MED. ASSO

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[illegible][illegible]

[

[illegible][illegible]

7

[illegible][illegible][illegible]

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**Zip Code**[illegible]

## PART 2: ATTORNEY INFORMATION

[illegible]

AMANDA									
--------	--	--	--	--	--	--	--	--	--

**G**

STEINMEYER

**M**

P	O	B	X	6	8	5	-	2	0	0	J	A	C	K	S	O	N		A	V	E	N	U	E		E	A	S	T								
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	--	---	---	---	---	---	---	--	---	---	---	---	--	--	--	--	--	--	--	--

[illegible]

SC

29924

State

**Zip Code**

(803) 943-4444

RECD MAR 27 2003

**SERIAL #** 1

**PART 3: PROPERTY INFORMATION****A. Real Property For Which A Claim Is Being Asserted**

1. What is the address of the real property for which a claim is being asserted (referred to herein as "the property")?

23 MINER STREET

Street Address

BOSTON

City

MA

State

02215

Zip Code

(Province) (Postal Code)

UNITED STATES

Country

2. Are you completing an Asbestos Property Damage Proof of Claim Form for any other real property other than the one listed at "1" above?

☐ Yes ☒ No

3. Do you currently own the property listed in Question 1, above?

☒ Yes ☐ No

4. When did you purchase the property?

		-			-				
Month		Day		Year					

5. What is the property used for (check all that apply)

☐ Owner occupied residence☐ Residential rental☒ Commercial☐ Industrial Specify: ☐ Other Specify: 

6. How many floors does the property have?

--	--	--

UNKNOWN

7. What is the approximate square footage of the property?

--	--	--	--	--	--	--	--	--	--

UNKNOWN

8. When was the property built?

☒ Before 1969☐ 1969 - 1973☐ After 1973

9. What is the structural support of the property?

☐ Wood frame☒ Structural concrete☐ Brick☐ Steel beam/girder☐ Other Specify: 

10. Have you or has someone on your behalf completed any interior renovations on the property which affected any asbestos on the property?

☒ Yes ☐ No

9276102

SERIAL #J

**A. Real Property For Which A Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes      ☐ No

If yes, please specify the dates and descriptions of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

**B. Claim Category**

12. For which category are you making a claim on the property?

☒ Category 1: Allegation with respect to asbestos from a Grace product in the property

☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

- If you checked Category 1 in question 12, complete section C.
- If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☐ Monokote-3 fireproofing insulation

☒ Other

Specify: SURFACE TREATMENT

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

--	--	--	--

Year

☒ I did not install the product(s)

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

--	--	--	--

Year

☒ Don't know.

9276103

SERIAL #

16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☐ Yes ☒ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

SEE ATTACHED

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

2003

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ATTACHED

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

2003

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ATTACHED

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ATTACHED

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

9276104

SERIAL #

25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

Year	Description
	VARIOUS YEARS, NUMEROUS PROJECTS
Year	Description
Year	Description

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes

☐ No

**If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

SEE ATTACHED

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes

☐ No NOT APPLICABLE

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Year	Company/Individual	VARIOUS YEARS, NUMEROUS SAMPLES
	Type of testing:	
Year	Company/Individual	
	Type of testing:	
Year	Company/Individual	
	Type of testing:	

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes

☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Year	Description
	AFFECTED BY NUMEROUS CUSTODIAL AND MAINTENANCE ACTIVITIES AND RENOVATIONS.
Year	Description
Year	Description

9276105

SERIAL #J



W.R. Grace & Co.

Asbestos Property Damage

(9276)

Proof of Claim Form

Missing Page

1 2 3 4 5

⑥ ⑦ ⑧ 9 10

**PART 4: ASBESTOS LITIGATION AND CLAIMS****A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No  
☒ Yes – lawsuit  
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No  
☒ Yes – lawsuit  
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

**B. LAWSUITS**

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption **ANDERSON MEMORIAL HOSPITAL, ON BEHALF OF ITSELF & OTHERS SIMILARLY SITUATED  
V. W.R. GRACE & COMPANY ET AL**
- b. Court where suit originally filed: **HAMPTON SC** Docket No.: **92CP25279**  
County/State
- c. Date filed: **12-23-1992**  
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed: Docket No.:  
County/State
- c. Date filed: - -  
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed: Docket No.:  
County/State
- c. Date filed: - -  
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:  -  -   
                             Month   Day    Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
                             Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
                             Month   Day    Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
                             Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
                             Month   Day    Year


c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
                             Name of Entity

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.

   -  -   
                             Month   Day    Year

SIGNATURE OF CLAIMANT AMANDA G. STEINMEYER

\*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both. 18 U.S.C. §§ 152 & 3571.

**Response to Question 17:** The Claimant understands Question 16 to ask for the existence of historical documents demonstrating that Grace's asbestos-containing product was purchased and/or installed in the property. As indicated in its response, the Claimant does not know of any such specific documents at this time. The Claimant assumes that there would have been a large number of original construction documents, including drawings and specifications, which, if not destroyed in the ordinary course of business, might possibly be found at a number of storage facilities, including those under the control of various persons involved with the design and construction of the property and the sale and installation of products in the property. In addition, this claim is based upon an assertion that debtors manufactured or sold products containing asbestos that are or were present in this property and/or all other theories of liability that are allowed by law including but not limited to conspiracy and fraudulent transfer. Moreover, Claimant believes Grace itself may be in control of supporting documentation, or other supporting information, regarding whom Grace or their salesmen sold their products to, and Claimant may need documentation or discovery from Grace on this issue. Claimant does not waive any rights, but is willing to discuss this matter with Grace if it believes Claimant's response is insufficient.

**Response to Question 19:** Refer to Question 17 Response.

**Response to Question 21:** Refer to Question 17 Response.

**Response to Question 23:** Taken literally, Question 22 seeks all documents relating to not only the removal, enclosure and encapsulation, but operations and maintenance documents which attempt to contain contamination from Grace's product. There is insufficient time to locate all such documents that might be called for in Question 22. To the extent that such documents have not been destroyed in the ordinary course of business, they may exist in the files or dead storage of many persons involved with such projects. Before undertaking an effort of this magnitude, Claimant would like to work with Grace to understand exactly what it is that Grace is seeking and whether Claimant can easily accommodate that request.

**Response to Question 27:** As Claimant understands Question 26, Grace seeks all documents of every kind and description not only related to the testing or sampling for the presence of asbestos, including samples taken during any abatement projects, as well as all samples related to any other particulates, including, by way of example only, all silicates, lead dust and other metal dust, beta glucans, etc. Such documents, to the extent they exist, may not only be in the possession of Claimant, but a number of third party contractors and/or consultants as well. Before undertaking the search for all of these documents, Claimant wishes to discuss this matter with Grace and obtain a clarification.

**EXHIBIT E**

**WR Grace**

SR00000504

**Property Damage****Index Sheet**

Claim Number: 00006661

Receive Date: 03/27/2003

**Multiple Claim Reference**

Claim Number \_\_\_\_\_

- ☐ MMPOC Medical Monitoring Claim Form  
☐ PDPOC Property Damage  
☐ NAPO Non-Asbestos Claim Form  
☐ Amended

Claim Number \_\_\_\_\_

- ☐ MMPOC Medical Monitoring Claim Form  
☐ PDPOC Property Damage  
☐ NAPO Non-Asbestos Claim Form  
☐ Amended

**Attorney Information**

Firm Number: 00131

Firm Name: Spelghts &amp; Runyan

Attorney Number: 00168

Attorney Name: Amanda G Steilmeyer

Zip Code: 29924

Cover Letter Location Number: SR00000504

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
<input type="checkbox"/> TBD <input type="checkbox"/> TBD <input type="checkbox"/> TBD <input type="checkbox"/> TBD <input type="checkbox"/> TBD	<input type="checkbox"/> TBD <input type="checkbox"/> TBD <input type="checkbox"/> TBD <input type="checkbox"/> TBD <input type="checkbox"/> TBD <input checked="" type="checkbox"/> Other Attachments	<input type="checkbox"/> Other Attachments
Other	<input type="checkbox"/> Non-Standard Form <input type="checkbox"/> Amended <input type="checkbox"/> Post-Deadline Postmark Date	

**PART 1: CLAIMING PARTY INFORMATION**

NAME:

AMERICAN MEDICAL ASSOCIATION BUILDING

Name of individual claimant (first, middle and last name) or business claimant

SOCIAL SECURITY NUMBER (Individual Claimants):

F.E.I.N. (Business Claimants)

(last four digits of SSN)

Other names by which claiming party has been known (such as maiden name or married name):

First

MI

Last

First

MI

Last

GENDER: ☐ MALE ☐ FEMALE

Mailing Address:

Street Address

City

State

Zip Code

(Province) (Postal Code)

Country

**PART 2: ATTORNEY INFORMATION**

The claiming party's attorney, if any (You do not need an attorney to file this form):

Law Firm Name:

SPEIGHTS &amp; RUNYAN

Name of Attorney:

AMANDA

First

G

MI

STEINMEYER

Last

Mailing Address:

P O BOX 685 - 200 JACKSON AVENUE EAST

Street Address

HAMPTON

City

SC

State

29924

Zip Code

(Province) (Postal Code)

Telephone:

(803) 943-4444

Area Code

REC'D MAR 27 2003

WR Grace PD.3.12.586

00006661

SR=504

9276101

SERIAL #J

**PART 3: PROPERTY INFORMATION****A. Real Property For Which A Claim Is Being Asserted**

1. What is the address of the real property for which a claim is being asserted (referred to herein as "the property")?

515 NORTH STATE STREET

Street Address

CHICAGO

City

IL

State

Zip Code

UNITED STATES

Country

(Province) (Postal Code)

2. Are you completing an Asbestos Property Damage Proof of Claim Form for any other real property other than the one listed at "1" above?

☐ Yes ☒ No

3. Do you currently own the property listed in Question 1, above?

☒ Yes ☐ No

4. When did you purchase the property?

- 1959

Month Day Year

5. What is the property used for (check all that apply)

☐ Owner occupied residence☐ Residential rental☒ Commercial☐ Industrial Specify:☐ Other Specify:

6. How many floors does the property have?

UNKNOWN

7. What is the approximate square footage of the property?

UNKNOWN

8. When was the property built?

☒ Before 1969☐ 1969 - 1973☐ After 1973

9. What is the structural support of the property?

☐ Wood frame☒ Structural concrete☐ Brick☐ Steel beam/girder☐ Other Specify:

10. Have you or has someone on your behalf completed any interior renovations on the property which affected any asbestos on the property?

☒ Yes ☐ No

9276102

SERIAL #



**A. Real Property For Which A Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes☐ No

If yes, please specify the dates and descriptions of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

**B. Claim Category**

12. For which category are you making a claim on the property?

☒ Category 1: Allegation with respect to asbestos from a Grace product in the property☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

- If you checked Category 1 in question 12, complete section C.
- If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☐ Monokote-3 fireproofing insulation☒ Other

Specify: SURFACE TREATMENT

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

--	--	--	--

Year

☒ I did not install the product(s)

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

1	9	5	9
---	---	---	---

Year

☐ Don't know.

9276103

SERIAL #J

16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☐ Yes ☒ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

SEE ATTACHED

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

2003

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ATTACHED

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

2003

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ATTACHED

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ATTACHED

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

9276104

SERIAL #

25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

Description **VARIOUS YEARS, NUMEROUS PROJECTS**

Year

Description

Year

Description

Year

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes

☐ No

**If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

**SEE ATTACHED**

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes

☐ No NOT APPLICABLE

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Company/Individual **VARIOUS YEARS, NUMEROUS SAMPLES**

Year

Type of testing:

Company/Individual

Year

Type of testing:

Company/Individual

Year

Type of testing:

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes

☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Description **AFFECTED BY NUMEROUS CUSTODIAL AND MAINTENANCE ACTIVITIES AND RENOVATIONS.**

Year

Description

Year

Description

Year

9276105

SERIAL #

W.R. Grace & Co.

Asbestos Property Damage

(9276)

Proof of Claim Form

Missing Page

1 2 3 4 5

⑥ ⑦ ⑧ 9 10

**PART 4: ASBESTOS LITIGATION AND CLAIMS****A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes – lawsuit
- ☐ Yes – non-lawsuit claim (other than a workers' compensation claim)
2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes – lawsuit
- ☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

**B. LAWSUITS**

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption ANDERSON MEMORIAL HOSPITAL, ON BEHALF OF ITSELF & OTHERS SIMILARLY SITUATED  
V. W.R. GRACE & COMPANY ET AL
- b. Court where suit originally filed: HAMPTON SC Docket No.: 92CP25279  
County/State
- c. Date filed: 12 - 23 - 1992  
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.

  
 SIGNATURE OF CLAIMANT AMANDA G. STEINMEYER

-  -   
Month Day Year

\*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both.  
 18 U.S.C. §§ 152 & 3571.

9276110

SERIAL #

**Response to Question 17:** The Claimant understands Question 16 to ask for the existence of historical documents demonstrating that Grace's asbestos-containing product was purchased and/or installed in the property. As indicated in its response, the Claimant does not know of any such specific documents at this time. The Claimant assumes that there would have been a large number of original construction documents, including drawings and specifications, which, if not destroyed in the ordinary course of business, might possibly be found at a number of storage facilities, including those under the control of various persons involved with the design and construction of the property and the sale and installation of products in the property. In addition, this claim is based upon an assertion that debtors manufactured or sold products containing asbestos that are or were present in this property and/or all other theories of liability that are allowed by law including but not limited to conspiracy and fraudulent transfer. Moreover, Claimant believes Grace itself may be in control of supporting documentation, or other supporting information, regarding whom Grace or their salesmen sold their products to, and Claimant may need documentation or discovery from Grace on this issue. Claimant does not waive any rights, but is willing to discuss this matter with Grace if it believes Claimant's response is insufficient.

**Response to Question 19:** Refer to Question 17 Response.

**Response to Question 21:** Refer to Question 17 Response.

**Response to Question 23:** Taken literally, Question 22 seeks all documents relating to not only the removal, enclosure and encapsulation, but operations and maintenance documents which attempt to contain contamination from Grace's product. There is insufficient time to locate all such documents that might be called for in Question 22. To the extent that such documents have not been destroyed in the ordinary course of business, they may exist in the files or dead storage of many persons involved with such projects. Before undertaking an effort of this magnitude, Claimant would like to work with Grace to understand exactly what it is that Grace is seeking and whether Claimant can easily accommodate that request.

**Response to Question 27:** As Claimant understands Question 26, Grace seeks all documents of every kind and description not only related to the testing or sampling for the presence of asbestos, including samples taken during any abatement projects, as well as all samples related to any other particulates, including, by way of example only, all silicates, lead dust and other metal dust, beta glucans, etc. Such documents, to the extent they exist, may not only be in the possession of Claimant, but a number of third party contractors and/or consultants as well. Before undertaking the search for all of these documents, Claimant wishes to discuss this matter with Grace and obtain a clarification.

**EXHIBIT F**





**WR Grace**  
Property Damage  
Index Sheet

SR00000504

Claim Number: 00006672

Receive Date: 03/27/2003

**Multiple Claim Reference**

Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended

Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended

**Attorney Information**

Firm Number: 00131 Firm Name: Speights &amp; Runyan

Attorney Number: 00168 Attorney Name: Amanda G Steilmeyer

Zip Code: 29924

Cover Letter Location Number: SR00000504

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	<input type="checkbox"/> Other Attachments
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
	<input type="checkbox"/> Other Attachments	
<b>Other</b>	<input type="checkbox"/> Non-Standard Form	
	<input type="checkbox"/> Amended	
	<input type="checkbox"/> Post-Deadline Postmark Date	

**PART 1: CLAIMING PARTY INFORMATION**

NAME:

**EMPLOYER'S MUTUAL JOB**

Name of individual claimant (first, middle and last name) or business claimant

SOCIAL SECURITY NUMBER (Individual Claimants):

F.E.I.N. (Business Claimants)

(last four digits of SSN)

Other names by which claiming party has been known (such as maiden name or married name):

MI

First

MI

Last

MI

First

MI

Last

GENDER: ☐ MALE ☐ FEMALE

Mailing Address:

Street Address

City

State

Zip Code

(Province) (Postal Code)

Country

**PART 2: ATTORNEY INFORMATION**

The claiming party's attorney, if any (You do not need an attorney to file this form):

Law Firm Name:

**SPEIGHTS & RUNYAN**

Name of Attorney:

**AMANDA**

G

**STEINMEYER**

First

MI

Last

Mailing Address:

**P O BOX 685 - 200 JACKSON AVENUE EAST**

Street Address

**HAMPTON**

City

**SC**

State

**29924**

Zip Code

(Province) (Postal Code)

Telephone:

**(803) 943-4444**

Area Code

REC'D MAR 27 2003

WR Grace PD.3.12.577

00006672

SR=504

9276101

SERIAL #

**1. What is the address of the real property for which a claim is being asserted (referred to herein as "the property")?**

[illegible][illegible]

W I

--	--	--	--	--

(Province) (Postal Code)

[illegible]

Country

- ☐
- Yes
- ☒
- No

- ☒
- Yes
- ☐
- No

- 1966

Month Day Year

- ☐
- Owner occupied residence

- ☐
- Residential rental

- Commercial**

- ☐
- Industrial      Specify:

- ☐
- Other Specify:

- |  |  |  |
|--|--|--|
|  |  |  |
|--|--|--|

UNKNOWN

- |  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|
|  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|

UNKNOWN

- ☒ Before 1969

- ☐ 1969 - 1973

- ☐ After 1973

- ☐
- Wood frame

- ## ■ Structural concrete

- ☐ **Brick**

- ☒ **Steel beam/girder**

- ☐
- Other Specify:

- ☒
- Yes
- ☐
- No

**SERIAL #**

**SECRET**

**A. Real Property For Which A Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes    ☐ No

If yes, please specify the dates and descriptions of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

**B. Claim Category**

12. For which category are you making a claim on the property?

☒ Category 1: Allegation with respect to asbestos from a Grace product in the property

☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

- If you checked Category 1 in question 12, complete section C.
- If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☐ Monokote-3 fireproofing insulation

☒ Other Specify: SURFACE TREATMENT

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

--	--	--	--

Year

☒ I did not install the product(s)

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

1	9	6	6
---	---	---	---

Year

☐ Don't know.

9276103

SERIAL #

16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☐ Yes ☒ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

SEE ATTACHED

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

2003

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ATTACHED

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

2003

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ATTACHED

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ATTACHED

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

9276104

SERIAL #

25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

Year	Description
	VARIOUS YEARS, NUMEROUS PROJECTS
Year	Description
Year	Description

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes

☐ No

**If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

SEE ATTACHED

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes

☐ No NOT APPLICABLE

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Year	Company/Individual	VARIOUS YEARS, NUMEROUS SAMPLES
	Type of testing:	
Year	Company/Individual	
	Type of testing:	
Year	Company/Individual	
	Type of testing:	

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes

☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Year	Description
	AFFECTED BY NUMEROUS CUSTODIAL AND MAINTENANCE ACTIVITIES AND RENOVATIONS.
Year	Description
Year	Description

9276105

SERIAL #

W.R. Grace & Co.

Asbestos Property Damage

(9276)

Proof of Claim Form

Missing Page

1 2 3 4 5

⑥ ⑦ ⑧ 9 10

I. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
- ☒ Yes – lawsuit
- ☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No
- ☒ Yes – lawsuit
- ☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption ANDERSON MEMORIAL HOSPITAL, ON BEHALF OF ITSELF & OTHERS SIMILARLY SITUATED  
V. W.R. GRACE & COMPANY ET AL

- b. Court where suit originally filed: HAMPTON SC Docket No.: 92CP25279  
County/State

- c. Date filed: 

1	2
---	---

 - 

2	3
---	---

 - 

1	9	9	2
---	---	---	---

  
Month Day Year

- a. Caption
- b. Court where suit originally filed:  Docket No.:   
*County/State*

- c. Date filed:   -   -      
Month Day Year

- a. Caption
- b. Court where suit originally filed:  Docket No.:   
*County/State*

- c. Date filed:   -   -      
Month Day Year

(Attach additional pages if necessary.)

9276109

**SERIAL #**



**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:  -  -

Month Day Year

c. Name of entity to whom claim was submitted:

☐ Grace

☐ Other

Name of Entity

a. Description of claim:

b. Date submitted:  -  -

Month Day Year

c. Name of entity to whom claim was submitted:

☐ Grace

☐ Other

Name of Entity

a. Description of claim:

b. Date submitted:  -  -

Month Day Year

c. Name of entity to whom claim was submitted:

☐ Grace

☐ Other

Name of Entity

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.



SIGNATURE OF CLAIMANT AMANDA G. STEINMEYER

-  -

Month Day Year

\*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both.  
18 U.S.C. §§ 152 & 3571.

**Response to Question 17:** The Claimant understands Question 16 to ask for the existence of historical documents demonstrating that Grace's asbestos-containing product was purchased and/or installed in the property. As indicated in its response, the Claimant does not know of any such specific documents at this time. The Claimant assumes that there would have been a large number of original construction documents, including drawings and specifications, which, if not destroyed in the ordinary course of business, might possibly be found at a number of storage facilities, including those under the control of various persons involved with the design and construction of the property and the sale and installation of products in the property. In addition, this claim is based upon an assertion that debtors manufactured or sold products containing asbestos that are or were present in this property and/or all other theories of liability that are allowed by law including but not limited to conspiracy and fraudulent transfer. Moreover, Claimant believes Grace itself may be in control of supporting documentation, or other supporting information, regarding whom Grace or their salesmen sold their products to, and Claimant may need documentation or discovery from Grace on this issue. Claimant does not waive any rights, but is willing to discuss this matter with Grace if it believes Claimant's response is insufficient.

**Response to Question 19:** Refer to Question 17 Response.

**Response to Question 21:** Refer to Question 17 Response.

**Response to Question 23:** Taken literally, Question 22 seeks all documents relating to not only the removal, enclosure and encapsulation, but operations and maintenance documents which attempt to contain contamination from Grace's product. There is insufficient time to locate all such documents that might be called for in Question 22. To the extent that such documents have not been destroyed in the ordinary course of business, they may exist in the files or dead storage of many persons involved with such projects. Before undertaking an effort of this magnitude, Claimant would like to work with Grace to understand exactly what it is that Grace is seeking and whether Claimant can easily accommodate that request.

**Response to Question 27:** As Claimant understands Question 26, Grace seeks all documents of every kind and description not only related to the testing or sampling for the presence of asbestos, including samples taken during any abatement projects, as well as all samples related to any other particulates, including, by way of example only, all silicates, lead dust and other metal dust, beta glucans, etc. Such documents, to the extent they exist, may not only be in the possession of Claimant, but a number of third party contractors and/or consultants as well. Before undertaking the search for all of these documents, Claimant wishes to discuss this matter with Grace and obtain a clarification.

**EXHIBIT G**



**WR Grace**  
Property Damage  
Index Sheet

SR00000504

Claim Number: 00006721

Receive Date: 03/27/2003

**Multiple Claim Reference**

Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended
Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended

**Attorney Information**

Firm Number: 00131 Firm Name: Spelghts & Runyan  
 Attorney Number: 00168 Attorney Name: Amanda G Steinmeyer  
 Zip Code: 29924  
 Cover Letter Location Number: SR00000504

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	<input type="checkbox"/> Other Attachments
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
	<input checked="" type="checkbox"/> Other Attachments	
<b>Other</b>	<input type="checkbox"/> Non-Standard Form	
	<input type="checkbox"/> Amended	
	<input type="checkbox"/> Post-Deadline Postmark Date	



**PART 3: PROPERTY INFORMATION****A. Real Property For Which A Claim Is Being Asserted**

1. What is the address of the real property for which a claim is being asserted (referred to herein as "the property")?

3910 KESWICK ROAD

Street Address

BALTIMORE

City

MD

State

21221

Zip Code

(Province) (Postal Code)

UNITED STATES

Country

2. Are you completing an Asbestos Property Damage Proof of Claim Form for any other real property other than the one listed at "1" above?

☐ Yes ☒ No

3. Do you currently own the property listed in Question 1, above?

☒ Yes ☐ No

4. When did you purchase the property?

- 1969

Month Day Year

5. What is the property used for (check all that apply)

☐ Owner occupied residence☐ Residential rental☒ Commercial☐ Industrial Specify:☐ Other Specify:

6. How many floors does the property have? UNKNOWN

7. What is the approximate square footage of the property? UNKNOWN

8. When was the property built?

☐ Before 1969☒ 1969 - 1973☐ After 1973

9. What is the structural support of the property?

☐ Wood frame☒ Structural concrete☐ Brick☐ Steel beam/girder☐ Other Specify:

10. Have you or has someone on your behalf completed any interior renovations on the property which affected any asbestos on the property?

☒ Yes ☐ No

9276102

SERIAL #

**A. Real Property For Which A Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

--	--	--	--

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

Year

--	--	--	--

Description

Year

--	--	--	--

Description

Year

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes    ☐ No

If yes, please specify the dates and descriptions of such renovations.

--	--	--	--

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

Year

--	--	--	--

Description

Year

--	--	--	--

Description

Year

**B. Claim Category**

12. For which category are you making a claim on the property?

- ☒ Category 1: Allegation with respect to asbestos from a Grace product in the property  
☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

- If you checked Category 1 in question 12, complete section C.
- If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☐ Monokote-3 fireproofing insulation

☒ Other    Specify: SURFACE TREATMENT

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

--	--	--	--

☒ I did not install the product(s)

Year

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

1	9	6	9
---	---	---	---

☐ Don't know.

Year

9276103

SERIAL #

16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☐ Yes ☒ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

SEE ATTACHED

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

2003

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ATTACHED

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

2003

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ATTACHED

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ATTACHED

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

9276104

SERIAL #



25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

Year	Description
	VARIOUS YEARS, NUMEROUS PROJECTS
Year	Description
Year	Description

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes    ☐ No    **If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

SEE ATTACHED

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes    ☐ No NOT APPLICABLE

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Year	Company/Individual	VARIOUS YEARS, NUMEROUS SAMPLES
	Type of testing:	
Year	Company/Individual	
	Type of testing:	
Year	Company/Individual	
	Type of testing:	

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes    ☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Year	Description
	AFFECTED BY NUMEROUS CUSTODIAL AND MAINTENANCE ACTIVITIES AND RENOVATIONS.
Year	Description
Year	Description

9276105

SERIAL #

W.R. Grace & Co.

Asbestos Property Damage

(9276)

Proof of Claim Form

Missing Page

1 2 3 4 5

⑥ ⑦ ⑧ 9 10

**PART 4: ASBESTOS LITIGATION AND CLAIMS****A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No  
☒ Yes – lawsuit  
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No  
☒ Yes – lawsuit  
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

**B. LAWSUITS**

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption **ANDERSON MEMORIAL HOSPITAL, ON BEHALF OF ITSELF & OTHERS SIMILARLY SITUATED  
V. W.R. GRACE & COMPANY ET AL**

b. Court where suit originally filed: **HAMPTON SC** Docket No.: **92CP25279**  
County/State

c. Date filed: **12-23-1992**  
Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:  
County/State

c. Date filed: - -  
Month Day Year

a. Caption

b. Court where suit originally filed: Docket No.:  
County/State

c. Date filed: - -  
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:  -  -  ☐  
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -  ☐  
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -  ☐  
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.

  
 SIGNATURE OF CLAIMANT **AMANDA G. STEINMEYER**

-  -   
Month Day Year

\*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both.  
 18 U.S.C. §§ 152 & 3571.

9276110

SERIAL #

**Response to Question 17:** The Claimant understands Question 16 to ask for the existence of historical documents demonstrating that Grace's asbestos-containing product was purchased and/or installed in the property. As indicated in its response, the Claimant does not know of any such specific documents at this time. The Claimant assumes that there would have been a large number of original construction documents, including drawings and specifications, which, if not destroyed in the ordinary course of business, might possibly be found at a number of storage facilities, including those under the control of various persons involved with the design and construction of the property and the sale and installation of products in the property. In addition, this claim is based upon an assertion that debtors manufactured or sold products containing asbestos that are or were present in this property and/or all other theories of liability that are allowed by law including but not limited to conspiracy and fraudulent transfer. Moreover, Claimant believes Grace itself may be in control of supporting documentation, or other supporting information, regarding whom Grace or their salesmen sold their products to, and Claimant may need documentation or discovery from Grace on this issue. Claimant does not waive any rights, but is willing to discuss this matter with Grace if it believes Claimant's response is insufficient.

**Response to Question 19:** Refer to Question 17 Response.

**Response to Question 21:** Refer to Question 17 Response.

**Response to Question 23:** Taken literally, Question 22 seeks all documents relating to not only the removal, enclosure and encapsulation, but operations and maintenance documents which attempt to contain contamination from Grace's product. There is insufficient time to locate all such documents that might be called for in Question 22. To the extent that such documents have not been destroyed in the ordinary course of business, they may exist in the files or dead storage of many persons involved with such projects. Before undertaking an effort of this magnitude, Claimant would like to work with Grace to understand exactly what it is that Grace is seeking and whether Claimant can easily accommodate that request.

**Response to Question 27:** As Claimant understands Question 26, Grace seeks all documents of every kind and description not only related to the testing or sampling for the presence of asbestos, including samples taken during any abatement projects, as well as all samples related to any other particulates, including, by way of example only, all silicates, lead dust and other metal dust, beta glucans, etc. Such documents, to the extent they exist, may not only be in the possession of Claimant, but a number of third party contractors and/or consultants as well. Before undertaking the search for all of these documents, Claimant wishes to discuss this matter with Grace and obtain a clarification.

**EXHIBIT H**



**WR Grace**  
**Property Damage**  
**Index Sheet**

SR00000504

Claim Number: 00006701

Receive Date: 03/27/2003

**Multiple Claim Reference**

Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended
Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended

**Attorney Information**

Firm Number: 00131      Firm Name: Speights & Runyan

Attorney Number: 00168      Attorney Name: Amanda G Steinmeyer

Zip Code: 29924

Cover Letter Location Number: SR00000504

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	<input type="checkbox"/> Other Attachments
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
	<input checked="" type="checkbox"/> Other Attachments	
Other	<input type="checkbox"/> Non-Standard Form	
	<input type="checkbox"/> Amended	
	<input type="checkbox"/> Post-Deadline Postmark Date	





**PART 3: PROPERTY INFORMATION****A. Real Property For Which A Claim Is Being Asserted**

1. What is the address of the real property for which a claim is being asserted (referred to herein as "the property")?

100 N. GREEN STREET #M

Street Address

GREENSBORO

City

NC

State

27401

Zip Code

(Province) (Postal Code)

UNITED STATES

Country

2. Are you completing an Asbestos Property Damage Proof of Claim Form for any other real property other than the one listed at "1" above?

☐ Yes ☒ No

3. Do you currently own the property listed in Question 1, above?

☒ Yes ☐ No

4. When did you purchase the property?

-1928

Month Day Year

5. What is the property used for (check all that apply)

☐ Owner occupied residence☐ Residential rental☒ Commercial☐ Industrial Specify:☐ Other Specify:

6. How many floors does the property have?

UNKNOWN

7. What is the approximate square footage of the property?

UNKNOWN

8. When was the property built?

☒ Before 1969☐ 1969 - 1973☐ After 1973

9. What is the structural support of the property?

☐ Wood frame☐ Structural concrete☐ Brick☒ Steel beam/girder☐ Other Specify:

10. Have you or has someone on your behalf completed any interior renovations on the property which affected any asbestos on the property?

☒ Yes ☐ No

9276102

SERIAL #

**A. Real Property For Which A Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

--	--	--	--

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

Year

--	--	--	--

Description

Year

--	--	--	--

Description

Year

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes    ☐ No

If yes, please specify the dates and descriptions of such renovations.

--	--	--	--

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

Year

--	--	--	--

Description

Year

--	--	--	--

Description

Year

**B. Claim Category**

12. For which category are you making a claim on the property?

☒ Category 1: Allegation with respect to asbestos from a Grace product in the property

☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

- If you checked Category 1 in question 12, complete section C.
- If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☐ Monokote-3 fireproofing insulation

☒ Other    Specify: SURFACE TREATMENT

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

--	--	--	--

☒ I did not install the product(s)

Year

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

--	--	--	--

☒ Don't know.

Year

9276103

SERIAL #

16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☐ Yes ☒ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

SEE ATTACHED

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

2003

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ATTACHED

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

2003

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ATTACHED

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ATTACHED

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

9276104

SERIAL #

25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

Description **VARIOUS YEARS, NUMEROUS PROJECTS**

Year

Description

Year

Description

Year

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes

☐ No

**If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

**SEE ATTACHED**

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes

☐ No NOT APPLICABLE

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Company/Individual **VARIOUS YEARS, NUMEROUS SAMPLES**

Year

Type of testing:

Company/Individual

Year

Type of testing:

Company/Individual

Year

Type of testing:

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes

☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Description **AFFECTED BY NUMEROUS CUSTODIAL AND MAINTENANCE ACTIVITIES AND RENOVATIONS.**

Year

Description

Year

Description

Year

9276105

SERIAL #J

W.R. Grace & Co.

Asbestos Property Damage

(9276)

Proof of Claim Form

Missing Page

1 2 3 4 5

⑥ ⑦ ⑧ 9 10

**PART 4: ASBESTOS LITIGATION AND CLAIMS****A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes - lawsuit
- ☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

**B. LAWSUITS**

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption ANDERSON MEMORIAL HOSPITAL, ON BEHALF OF ITSELF & OTHERS SIMILARLY SITUATED  
V. W.R. GRACE & COMPANY ET AL
- b. Court where suit originally filed: HAMPTON SC Docket No.: 92CP25279  
County/State
- c. Date filed: 12 - 23 - 1992  
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #J

**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.

  
 SIGNATURE OF CLAIMANT AMANDA G. STEINMEYER

-  -   
Month Day Year

\*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both.  
 18 U.S.C. §§ 152 & 3571.

9276110

SERIAL #

**Response to Question 17:** The Claimant understands Question 16 to ask for the existence of historical documents demonstrating that Grace's asbestos-containing product was purchased and/or installed in the property. As indicated in its response, the Claimant does not know of any such specific documents at this time. The Claimant assumes that there would have been a large number of original construction documents, including drawings and specifications, which, if not destroyed in the ordinary course of business, might possibly be found at a number of storage facilities, including those under the control of various persons involved with the design and construction of the property and the sale and installation of products in the property. In addition, this claim is based upon an assertion that debtors manufactured or sold products containing asbestos that are or were present in this property and/or all other theories of liability that are allowed by law including but not limited to conspiracy and fraudulent transfer. Moreover, Claimant believes Grace itself may be in control of supporting documentation, or other supporting information, regarding whom Grace or their salesmen sold their products to, and Claimant may need documentation or discovery from Grace on this issue. Claimant does not waive any rights, but is willing to discuss this matter with Grace if it believes Claimant's response is insufficient.

**Response to Question 19:** Refer to Question 17 Response.

**Response to Question 21:** Refer to Question 17 Response.

**Response to Question 23:** Taken literally, Question 22 seeks all documents relating to not only the removal, enclosure and encapsulation, but operations and maintenance documents which attempt to contain contamination from Grace's product. There is insufficient time to locate all such documents that might be called for in Question 22. To the extent that such documents have not been destroyed in the ordinary course of business, they may exist in the files or dead storage of many persons involved with such projects. Before undertaking an effort of this magnitude, Claimant would like to work with Grace to understand exactly what it is that Grace is seeking and whether Claimant can easily accommodate that request.

**Response to Question 27:** As Claimant understands Question 26, Grace seeks all documents of every kind and description not only related to the testing or sampling for the presence of asbestos, including samples taken during any abatement projects, as well as all samples related to any other particulates, including, by way of example only, all silicates, lead dust and other metal dust, beta glucans, etc. Such documents, to the extent they exist, may not only be in the possession of Claimant, but a number of third party contractors and/or consultants as well. Before undertaking the search for all of these documents, Claimant wishes to discuss this matter with Grace and obtain a clarification.



**EXHIBIT I**



**WR Grace**  
Property Damage  
Index Sheet

SR00000811

Claim Number: 00011591

Receive Date: 03/31/2003

**Multiple Claim Reference**

Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended
Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended

**Attorney Information**

Firm Number: 00131 Firm Name: Spelghts & Runyan

Attorney Number: 00227 Attorney Name: Daniel A Spelghts

Zip Code: 29924

Cover Letter Location Number: SR00000611

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	<input type="checkbox"/> Other Attachments
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
	<input checked="" type="checkbox"/> Other Attachments	
Other	<input type="checkbox"/> Non-Standard Form	
	<input type="checkbox"/> Amended	
	<input type="checkbox"/> Post-Deadline Postmark Date	

## PART 2: ATTORNEY INFORMATION

**SERIAL #** \_\_\_\_\_

**PART 3: PROPERTY INFORMATION****A. Real Property For Which A Claim Is Being Asserted**

1. What is the address of the real property for which a claim is being asserted (referred to herein as "the property")?

3250 EUCLID AVENUE

Street Address

CLEVELAND

City

OH

State

Zip Code

UNITED STATES

Country

(Province) (Postal Code)

2. Are you completing an Asbestos Property Damage Proof of Claim Form for any other real property other than the one listed at "1" above?

☐ Yes ☒ No

3. Do you currently own the property listed in Question 1, above?

☒ Yes ☐ No

4. When did you purchase the property?

- 1972

Month Day Year

5. What is the property used for (check all that apply)

☐ Owner occupied residence☐ Residential rental☒ Commercial☐ Industrial Specify:☐ Other Specify:

6. How many floors does the property have?

UNKNOWN

UNKNOWN

7. What is the approximate square footage of the property?

UNKNOWN

8. When was the property built?

☐ Before 1969☒ 1969 - 1973☐ After 1973

9. What is the structural support of the property?

☐ Wood frame☐ Structural concrete☐ Brick☒ Steel beam/girder☐ Other Specify:

10. Have you or has someone on your behalf completed any interior renovations on the property which affected any asbestos on the property?

☒ Yes ☐ No

9276102

SERIAL #

**A. Real Property For Which A Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes      ☐ No

If yes, please specify the dates and descriptions of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

**B. Claim Category**

12. For which category are you making a claim on the property?

☒ Category 1: Allegation with respect to asbestos from a Grace product in the property

☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

- If you checked Category 1 in question 12, complete section C.
- If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☒ Monokote-3 fireproofing insulation

☐ Other      Specify:

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

--	--	--	--

Year

☒ I did not install the product(s)

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

1	9	7	2
---	---	---	---

Year

☐ Don't know.

9276103

SERIAL #

16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☒ Yes ☐ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

NOT APPLICABLE

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

2003

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ATTACHED

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

2003

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ATTACHED

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ATTACHED

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

9276104

SERIAL #

25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

Year

Description **VARIOUS YEARS, NUMEROUS PROJECTS**


Year

Description

Year

Description

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes☐ No**If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

**SEE ATTACHED**

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes☐ No NOT APPLICABLE

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Year

Company/Individual **VARIOUS YEARS, NUMEROUS SAMPLES**

Type of testing:

Year

Company/Individual

Type of testing:

Year

Company/Individual

Type of testing:

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Year

Description **AFFECTED BY NUMEROUS CUSTODIAL AND MAINTENANCE ACTIVITIES AND RENOVATIONS.**


Year

Description

Year

Description

9276105

SERIAL #

W.R. Grace & Co.

Asbestos Property Damage

(9276)

Proof of Claim Form

Missing Page

1

2

3

4

5

⑥

⑦

⑧

9

10



**PART 4: ASBESTOS LITIGATION AND CLAIMS****A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No  
☒ Yes - lawsuit  
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No  
☒ Yes - lawsuit  
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

**B. LAWSUITS**

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption: ANDERSON MEMORIAL HOSPITAL, ON BEHALF OF ITSELF & OTHERS SIMILARLY SITUATED  
V. W.R. GRACE & COMPANY ET AL.
- b. Court where suit originally filed: HAMPTON SC Docket No.: 92CP25279  
County/State
- c. Date filed: 12 - 23 - 1992  
Month Day Year
- 
- a. Caption:
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year
- 
- a. Caption:
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.

  
SIGNATURE OF CLAIMANT AMANDA G. STEINMEYER

-  -   
Month Day Year

\*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both.  
18 U.S.C. §§ 152 & 3571.

9276110

SERIAL #

**Response to Question 19:** Through this bankruptcy process.

**Response to Question 21:** Refer to Question 19 Response.

**Response to Question 23:** Taken literally, Question 22 seeks all documents relating to not only the removal, enclosure and encapsulation, but operations and maintenance documents which attempt to contain contamination from Grace's product. There is insufficient time to locate all such documents that might be called for in Question 22. To the extent that such documents have not been destroyed in the ordinary course of business, they may exist in the files or dead storage of many persons involved with such projects. Before undertaking an effort of this magnitude, Claimant would like to work with Grace to understand exactly what it is that Grace is seeking and whether Claimant can easily accommodate that request.

**Response to Question 27:** As Claimant understands Question 26, Grace seeks all documents of every kind and description not only related to the testing or sampling for the presence of asbestos, including samples taken during any abatement projects, as well as all samples related to any other particulates, including, by way of example only, all silicates, lead dust and other metal dust, beta glucans, etc. Such documents, to the extent they exist, may not only be in the possession of Claimant, but a number of third party contractors and/or consultants as well. Before undertaking the search for all of these documents, Claimant wishes to discuss this matter with Grace and obtain a clarification.

04  
47

INVOICE  
**ZONOLITE**  
CONSTRUCTION PRODUCTS DIVISION  
P.O. BOX 7093 CHICAGO, ILLINOIS 60680

W. R. GRACE & CO.  
**GRACE**

INVOICE NO. 5-31-72  
INVOICE DATE 6-6-72  
SHIPPED VIA 57-051  
LOCATION 4-034-035  
CUST NO. 21994  
PLANT DIST. TERRITORY/OUR ORDER NO. 657 637 511  
SHIP FROM NEW CASTLE  
CUST. ORDER NO. AND DATE PM 5-28-72  
BILL OF LADING NO. CHECKED F-024

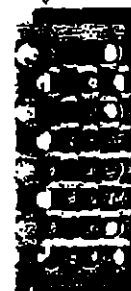
**ZONOLITE TRUCK**

SOLD TO PARSTONE PLASTERING  
1960 E. 123RD ST.  
CLEVELAND, OHIO 44106  
SHIP TO C/O LABOREZ'S LOCAL 319  
UNION OFFICE BLDG.  
3250 EUCLID AVE.  
CLEVELAND, OHIO

QUANTITIES ORDERED	DESCRIPTION	UNIT PRICE	TOTAL AMOUNT
150	BAGS MONO-KOTE MK-3	41-06-01-1-19	1360.00
	PLUS 1/2% SALES TAX	2.40	16.20
	PLUS FREIGHT CHARGE	-	24.00
			1400.20

☒ 1% 7.20 CASH DISCOUNT ALLOWED IF PAID BY 6-16-72  
☐ NO CASH DISCOUNT - NET 30 DAYS

PLEASE MAKE ALL REMITTANCES PAYABLE TO CONSTRUCTION PRODUCTS DIVISION, W. R. GRACE & CO.  
THIS ORDER IS SCHEDULED FOR SHIPMENT ON OR ABOUT



6-21-72

ZONOLITE

CONSTRUCTION PRODUCTS DIVISION

P.O. BOX 7093 CHICAGO, ILLINOIS 60680

LOCATION

1-034-035

PLANT

657 651 511

DIST. TERRITORY

OUR ORDER NO.

CUST. ORDER NO. AND DATE

PI 6-13-72

CUST. NO.

CAR NO.

BILL OF LADING NO. CHECKED

NEW CASTLE

F-125

ATBDE PLASTERING

10 E. 123RD. ST.  
CLEVELAND, OHIO 44106

SAVE

LOCAL 310 LABOR UNION HALL  
EAST 92ND & ENCLIN AVE.  
CLEVELAND, OHIO

SHIP TO

QUANTITY

DESCRIPTION

UNIT PRICE

AMOUNT

125 BAGS MONO KOTE MC-3

41-06-01-1-19

2.40

\$300.00

PLUS 4% SALES TAX.....  
PLUS FREIGHT CHARGE.....

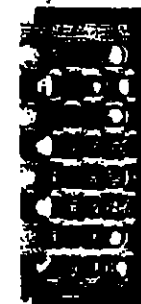
13.50  
25.00  
\$338.50

☒ \$6.00 CASH DISCOUNT ALLOWED IF PAID BY 6-30-72

☐ NO CASH DISCOUNT - NET 30 DAYS

PLEASE MAKE ALL REMITTANCES PAYABLE TO CONSTRUCTION PRODUCTS DIVISION, W. R. GRACE & CO.

THIS ORDER IS SCHEDULED FOR SHIP ON OR ABOUT



7.

**EXHIBIT J**



**WR Grace**  
Property Damage  
Index Sheet

SR00000503

Claim Number: 00006630

Receive Date: 03/27/2003

**Multiple Claim Reference**

Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended
Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended

**Attorney Information**

Firm Number: 00131 Firm Name: Spelights & Runyan

Attorney Number: 00168 Attorney Name: Amanda G Steinmeyer

Zip Code: 29924

Cover Letter Location Number: SR00000503

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	<input type="checkbox"/> Other Attachments
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
	<input checked="" type="checkbox"/> Other Attachments	
<b>Other</b>	<input type="checkbox"/> Non-Standard Form	
	<input type="checkbox"/> Amended	
	<input type="checkbox"/> Post-Deadline Postmark Date	





**PART 3: PROPERTY INFORMATION****A. Real Property For Which A Claim Is Being Asserted**

1. What is the address of the real property for which a claim is being asserted (referred to herein as "the property")?

835 EWING STREET

Street Address

FORT WAYNE

City

IN

State

46802

Zip Code

(Province) (Postal Code)

UNITED STATES

Country

2. Are you completing an Asbestos Property Damage Proof of Claim Form for any other real property other than the one listed at "1" above?

☐ Yes ☒ No

3. Do you currently own the property listed in Question 1, above?

☒ Yes ☐ No

4. When did you purchase the property?

- - 1928

Month Day Year

5. What is the property used for (check all that apply)

☐ Owner occupied residence☐ Residential rental☒ Commercial☐ Industrial Specify:☐ Other Specify:

6. How many floors does the property have?

004

7. What is the approximate square footage of the property?

38400

8. When was the property built?

☒ Before 1969☐ 1969 - 1973☐ After 1973

9. What is the structural support of the property?

☐ Wood frame☐ Structural concrete☐ Brick☒ Steel beam/girder☐ Other Specify:

10. Have you or has someone on your behalf completed any interior renovations on the property which affected any asbestos on the property?

☒ Yes ☐ No

9276102

SERIAL #

**A. Real Property For Which A Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes      ☐ No

If yes, please specify the dates and descriptions of such renovations.

--	--	--	--

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description

--	--	--	--

Year

Description

**B. Claim Category**

12. For which category are you making a claim on the property?

- ☒ Category 1: Allegation with respect to asbestos from a Grace product in the property  
☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

- If you checked Category 1 in question 12, complete section C.
- If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☐ Monokote-3 fireproofing insulation

☒ Other Specify: SURFACE TREATMENT

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

--	--	--	--

Year

☒ I did not install the product(s)

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

--	--	--	--

Year

☒ Don't know.

9276103

SERIAL #

16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☐ Yes ☒ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

SEE ATTACHED

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

2003

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ATTACHED

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

2003

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ATTACHED

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ATTACHED

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

9276104

SERIAL #

25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

Year	Description
	VARIOUS YEARS, NUMEROUS PROJECTS
Year	Description
Year	Description

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes

☐ No

**If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

SEE ATTACHED

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes

☐ No NOT APPLICABLE

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Year	Company/Individual	VARIOUS YEARS, NUMEROUS SAMPLES
	Type of testing:	
Year	Company/Individual	
	Type of testing:	
Year	Company/Individual	
	Type of testing:	

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes

☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Year	Description
	AFFECTED BY NUMEROUS CUSTODIAL AND MAINTENANCE ACTIVITIES AND RENOVATIONS.
Year	Description
Year	Description

9276105

SERIAL #

W.R. Grace & Co.

Asbestos Property Damage

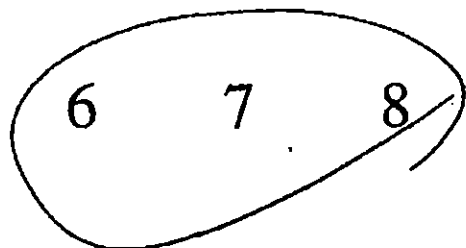
(9276)

Proof of Claim Form

Missing Page

1 2 3 4 5

6 7 8 9 10

A hand-drawn oval encircles the numbers 6, 7, and 8. A diagonal line is drawn across the number 8, extending from the bottom right towards the middle of the number.

**PART 4: ASBESTOS LITIGATION AND CLAIMS****A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No  
☒ Yes – lawsuit  
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

- ☐ No  
☒ Yes – lawsuit  
☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

**B. LAWSUITS**

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption **ANDERSON MEMORIAL HOSPITAL, ON BEHALF OF ITSELF & OTHERS SIMILARLY SITUATED  
V. W.R. GRACE & COMPANY ET AL**
- b. Court where suit originally filed: **HAMPTON SC** Docket No.: **92CP25279**  
County/State
- c. Date filed: **12-23-1992**  
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed: Docket No.:  
County/State
- c. Date filed: - -  
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed: Docket No.:  
County/State
- c. Date filed: - -  
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.

  
 SIGNATURE OF CLAIMANT **AMANDA G. STEINMEYER**

-  -   
Month Day Year

\*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both.  
 18 U.S.C. §§ 152 & 3571.

9276110

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SERIAL #J

**Response to Question 17:** The Claimant understands Question 16 to ask for the existence of historical documents demonstrating that Grace's asbestos-containing product was purchased and/or installed in the property. As indicated in its response, the Claimant does not know of any such specific documents at this time. The Claimant assumes that there would have been a large number of original construction documents, including drawings and specifications, which, if not destroyed in the ordinary course of business, might possibly be found at a number of storage facilities, including those under the control of various persons involved with the design and construction of the property and the sale and installation of products in the property. In addition, this claim is based upon an assertion that debtors manufactured or sold products containing asbestos that are or were present in this property and/or all other theories of liability that are allowed by law including but not limited to conspiracy and fraudulent transfer. Moreover, Claimant believes Grace itself may be in control of supporting documentation, or other supporting information, regarding whom Grace or their salesmen sold their products to, and Claimant may need documentation or discovery from Grace on this issue. Claimant does not waive any rights, but is willing to discuss this matter with Grace if it believes Claimant's response is insufficient.

**Response to Question 19:** Refer to Question 17 Response.

**Response to Question 21:** Refer to Question 17 Response.

**Response to Question 23:** Taken literally, Question 22 seeks all documents relating to not only the removal, enclosure and encapsulation, but operations and maintenance documents which attempt to contain contamination from Grace's product. There is insufficient time to locate all such documents that might be called for in Question 22. To the extent that such documents have not been destroyed in the ordinary course of business, they may exist in the files or dead storage of many persons involved with such projects. Before undertaking an effort of this magnitude, Claimant would like to work with Grace to understand exactly what it is that Grace is seeking and whether Claimant can easily accommodate that request.

**Response to Question 27:** As Claimant understands Question 26, Grace seeks all documents of every kind and description not only related to the testing or sampling for the presence of asbestos, including samples taken during any abatement projects, as well as all samples related to any other particulates, including, by way of example only, all silicates, lead dust and other metal dust, beta glucans, etc. Such documents, to the extent they exist, may not only be in the possession of Claimant, but a number of third party contractors and/or consultants as well. Before undertaking the search for all of these documents, Claimant wishes to discuss this matter with Grace and obtain a clarification.



**EXHIBIT K**



**WR Grace**  
Property Damage  
Index Sheet

SR00000617

Claim Number: 00010873

Receive Date: 03/31/2003

**Multiple Claim Reference**

Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended
Claim Number _____	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended

**Attorney Information**

Firm Number: 00131	Firm Name: Speights & Runyan
Attorney Number: 00168	Attorney Name: Amanda G Steinmeyer
Zip Code: 29924	
Cover Letter Location Number: SR00000617	

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	<input type="checkbox"/> Other Attachments
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
	<input checked="" type="checkbox"/> Other Attachments	
Other	<input type="checkbox"/> Non-Standard Form <input type="checkbox"/> Amended <input type="checkbox"/> Post-Deadline Postmark Date	





**A. Real Property For Which A Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

Year

Description

Year

Description

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes ☐ No

If yes, please specify the dates and descriptions of such renovations.

Year

Description MULTIPLE RENOVATIONS OVER VARIOUS YEARS

Year

Description

Year

Description

**B. Claim Category**

12. For which category are you making a claim on the property?

☒ Category 1: Allegation with respect to asbestos from a Grace product in the property☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

• If you checked Category 1 in question 12, complete section C.

• If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☒ Monokote-3 fireproofing insulation☐ Other Specify:

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos containing product(s) in the property?

Year

☒ I did not install the product(s)

15. If you or someone on your behalf did not install the asbestos containing product(s), to the best of your knowledge, when was/were the product(s) installed?

Year

☐ Don't know.

9276103

SERIAL #

16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☒ Yes ☐ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

NOT APPLICABLE

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

2003

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ATTACHED

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

2003

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ATTACHED

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ATTACHED

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

9276104

SERIAL #

25. If you responded Yes to question 22. or 24. and you have not supplied documents, please specify the dates and descriptions of any such efforts.

--	--	--	--

Description **VARIOUS YEARS, NUMEROUS PROJECTS**

Year

--	--	--	--

Description

Year

--	--	--	--

Description

Year

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes

☐ No

**If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26., but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

**SEE ATTACHED**

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes

☐ No NOT APPLICABLE

29. If you responded Yes to question 26. or 28. and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

--	--	--	--

Company/Individual **VARIOUS YEARS, NUMEROUS SAMPLES**

Year

Type of testing:

--	--	--	--

Company/Individual

Year

Type of testing:

--	--	--	--

Company/Individual

Year

Type of testing:

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes

☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

--	--	--	--

Description **AFFECTED BY NUMEROUS CUSTODIAL AND MAINTENANCE ACTIVITIES AND RENOVATIONS.**

Year

--	--	--	--

Description

Year

--	--	--	--

Description

Year

9276105

SERIAL #

W.R. Grace & Co.

Asbestos Property Damage

(9276)

Proof of Claim Form

Missing Page

1 2 3 4 5

⑥ ⑦ ⑧ 9 10



**PART 4: ASBESTOS LITIGATION AND CLAIMS****A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes – lawsuit
- ☐ Yes – non-lawsuit claim (other than a workers' compensation claim)
2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?
- ☐ No
- ☒ Yes – lawsuit
- ☐ Yes – non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

**B. LAWSUITS**

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

- a. Caption ANDERSON MEMORIAL HOSPITAL, ON BEHALF OF ITSELF & OTHERS SIMILARLY SITUATED  
V. W.R. GRACE & COMPANY, ET AL
- b. Court where suit originally filed: HAMPTON SC Docket No.: 92CP25279  
County/State
- c. Date filed: 12 - 23 - 1992  
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year
- 
- a. Caption
- b. Court where suit originally filed:  Docket No.:   
County/State
- c. Date filed:  -  -   
Month Day Year

(Attach additional pages if necessary.)

9276109

SERIAL #

**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
Name of Entity

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to the claiming party, disclose any and all records to Grace or to Grace's representative.

  
 SIGNATURE OF CLAIMANT **AMANDA G. STEINMEYER**

-  -   
Month Day Year

\*The penalty for presenting a fraudulent claim is a fine up to \$500,000.00 or imprisonment up to 5 years, or both.  
 18 U.S.C. §§ 152 & 3571.

9276110

SERIAL #J

**Response to Question 17:** The Claimant understands Question 16 to ask for the existence of historical documents demonstrating that Grace's asbestos-containing product was purchased and/or installed in the property. As indicated in its response, the Claimant does not know of any such specific documents at this time. The Claimant assumes that there would have been a large number of original construction documents, including drawings and specifications, which, if not destroyed in the ordinary course of business, might possibly be found at a number of storage facilities, including those under the control of various persons involved with the design and construction of the property and the sale and installation of products in the property. In addition, this claim is based upon an assertion that debtors manufactured or sold products containing asbestos that are or were present in this property and/or all other theories of liability that are allowed by law including but not limited to conspiracy and fraudulent transfer. Moreover, Claimant believes Grace itself may be in control of supporting documentation, or other supporting information, regarding whom Grace or their salesmen sold their products to, and Claimant may need documentation or discovery from Grace on this issue. Claimant does not waive any rights, but is willing to discuss this matter with Grace if it believes Claimant's response is insufficient.

**Response to Question 19:** Through this bankruptcy process.

**Response to Question 21:** Refer to Question 17 Response.

**Response to Question 23:** Taken literally, Question 22 seeks all documents relating to not only the removal, enclosure and encapsulation, but operations and maintenance documents which attempt to contain contamination from Grace's product. There is insufficient time to locate all such documents that might be called for in Question 22. To the extent that such documents have not been destroyed in the ordinary course of business, they may exist in the files or dead storage of many persons involved with such projects. Before undertaking an effort of this magnitude, Claimant would like to work with Grace to understand exactly what it is that Grace is seeking and whether Claimant can easily accommodate that request.

**Response to Question 27:** As Claimant understands Question 26, Grace seeks all documents of every kind and description not only related to the testing or sampling for the presence of asbestos, including samples taken during any abatement projects, as well as all samples related to any other particulates, including, by way of example only, all silicates, lead dust and other metal dust, beta glucans, etc. Such documents, to the extent they exist, may not only be in the possession of Claimant, but a number of third party contractors and/or consultants as well. Before undertaking the search for all of these documents, Claimant wishes to discuss this matter with Grace and obtain a clarification.

W. R. GRACE &amp; CO.



# INVOICE

## ZONOLITE

CONSTRUCTION PRODUCTS DIVISION  
62 WHITTEMORE AVE., CAMBRIDGE, MASS. 02140

PLEASE REMIT  
WITH COPY OF INVOICE  
TO:  
P.O. BOX 96160  
CHICAGO, ILLINOIS 60680

INVOICE DATE	3/23/73	16-007	6-033-059	616 611 114	10-063	VERBAL
SHIPPED VIA	CUSTOMER NO.	SHIPPED FROM	CAN NUMBER	SALES BRANCH NO.	CHECK	
CUSTOMERS TRUCK	04683	KEARNEY	P/U	4-37		

SOLD TO

RYTARE MACHINE CO.  
P.O. BOX 406  
LAURENS, S.C.

SHIP TO

SAME

D - U - N - S 04 - 827 - 2637

QUANTITY ORDERED	QUANTITY SHIPPED	DESCRIPTION	UNIT PRICE	AMOUNT
30	30	BAGS ZONOLITE MK (41-06-01-1-19)	2.55	\$ 76.50
		PLUS 4% SALES TAX		3.06
				<u>\$ 79.56</u>

THIS ORDER IS SCHEDULED FOR SHIPMENT  
ON OR ABOUT \_\_\_\_\_

☒ \$ 1.53 CASH DISCOUNT ALLOWED IF PAID BY 4/9/73  
☐ NO CASH DISCOUNT - NET 30 DAYS

TO AVOID DELAY, REFER ALL MATTERS REGARDING THIS SHIPMENT, "OTHER THAN PAYMENTS," TO THE SALES BRANCH SERVING YOU

Use of the above goods shall be an acceptance of the conditions of sale on the reverse side hereof as the nitty conditions applying to the sale of said goods

W. R. GRACE &amp; CO.

**GRACE****INVOICE  
ZONOLITE**CONSTRUCTION PRODUCTS DIVISION  
82 WHITTEMORE AVE., CAMBRIDGE, MASS. 02140PLEASE REMIT  
WITH COPY OF INVOICE  
TO:  
P.O. BOX 96160  
CHICAGO, ILLINOIS 60690

INVOICE DATE: 5-7-73	INVOICE NO.: 16-083	LOCATION: 6-039-059	PLANT: 616 611	QTY: 114	TERMS: 18-574	CUST. ORDER NO. AND DATE:
SHIPPED VIA: TCK UP			CUSTOMER NO.: 04683	SHIPPED FROM: KEARNEY	CAR NUMBER: PS	BILL OF LADING NO.: 57139
D - U - N - S 04 - 827 - 2637						CHECKED:

SOLD TO

BYARS MACHINE CO.  
P. O. BOX 406  
LAURENS, S. C.S  
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SAME

QUANTITY ORDERED	QUANTITY SHIPPED	DESCRIPTION	UNIT PRICE	AMOUNT
100	100	BAGS ZONOLITE MK 3 (41-06-01-1-19)	2.55	\$ 255.00
		PLUS 4% SALES TAX		10.20
				<del>\$ 265.20</del>

THIS ORDER IS SCHEDULED FOR SHIPMENT  
ON OR ABOUT \_\_\_\_\_

X \$ 5.10 CASH DISCOUNT ALLOWED IF PAID BY 5-28-73

NO CASH DISCOUNT - NET 30 DAYS

TO AVOID DELAY, REFER ALL MATTERS REGARDING THIS SHIPMENT, "OTHER THAN PAYMENTS," TO THE SALES BRANCH SERVING

Use of the above goods shall be an acceptance of the conditions of sale on the reverse side hereof as the only conditions applying to the sale of said goods.

**GRACE**

**ZONOLITE**  
 CONSTRUCTION PRODUCTS DIVISION  
 62 WHITTEMORE AVE. CAMBRIDGE, MASS. 02140

INVOICE DATE <b>3-14-73</b>	INVOICE NO. <b>16-183</b>	PLANT <b>616</b>	EST. <b>611</b>	TERRITORY <b>114</b>	OUR ORDER NUMBER <b>10-757</b>	CUSTOMER NO. <b>3-233</b>
SHIPPED VIA <b>TRUCK</b>		SHIPPED FROM <b>HEARNEY</b>		CARR NUMBER <b>FU</b>		BILL OF LADING NO. (REQUIRED) <b>3/183</b>

SOLD TO

**BYARS MACHINE CO.****LAWREN, S. C. 29360**S  
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O**ENC**

D-U-N-S 04-027-2637

QUANTITY ORDERED	QUANTITY SHIPPED	DESCRIPTION	UNIT PRICE	AMOUNT
150	150	BAGS ZONOLITE MK (41-06-01-1-19)	2.95	302.50
		PLUS 4% SALES TAX		15.32
				317.82

☒ \$ **7.65** CASH DISCOUNT ALLOWED IF PAID BY **4-1-73**
☐ NO CASH DISCOUNT - NET 30 DAYS

TO AVOID DELAY, REFER ALL MATTERS REGARDING THIS SHIPMENT, "OTHER THAN PAYMENTS," TO THE SALES BRANCH SERVING YOU

These goods shall be an acceptance of the conditions of sale on the reverse side hereof as the only conditions applying to the sale of said goods.

SC#  
320

W. R. GRACE &amp; CO.

**GRACE****INVOICE  
ZONOLITE**CONSTRUCTION PRODUCTS DIVISION  
62 WHITTEMORE AVE., CAMBRIDGE, MASS. 02140PLEASE REMIT  
WITH COPY OF INVOICE  
TO:  
P.O. BOX 86180  
CHICAGO, ILLINOIS 60680

INVOICE NO.	16-157	6-03-53	616 614 114	10-06
SHIPPED VIA	TRUCK	CUSTOMER NO.	SHIPPED FROM	CAGE NUMBER
			HEARST	
				16-157

SOLD TO

STARS MACHING CO.  
P. O. BOX 406  
LAURENS, S. C.S  
H  
I  
P  
T  
O

NAME

D - U - N - S 04 - 827 - 2637

QUANTITY ORDERED	QUANTITY SHIPPED	DESCRIPTION	UNIT PRICE	AMOUNT
50	50	5000 ZONOLITE MK (41-06-01-1-19)	2.40	\$ 120.00
		PLUS 4% SALES TAX		<u>4.80</u>
				\$ 124.80

THIS ORDER IS SCHEDULED FOR SHIPMENT  
ON OR ABOUT \_\_\_\_\_☐ \$ \_\_\_\_\_ CASH DISCOUNT ALLOWED IF PAID BY \_\_\_\_\_☐ NO CASH DISCOUNT - NET 30 DAYS

TO AVOID DELAY, REFER ALL MATTERS REGARDING THIS SHIPMENT, "OTHER THAN PAYMENTS," TO THE SALES BRANCH SERVING YOU.

Use of the above goods shall be an acceptance of the conditions of sale on the reverse side hereof as the only conditions applying to the sale of said goods.

504  
201



# WR Grace

Property Damage  
Index Sheet

SR00000946

Claim Number: 00016009

Receive Date: 05/17/2005

**Multiple Claim Reference**

Claim Number	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended
Claim Number	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended

**Attorney Information**

Firm Number: 00131

Firm Name: Speights &amp; Runyan

Attorney Number: 00227

Attorney Name: Daniel A Speights

Zip Code: 29924

Cover Letter Location Number: SR00000946

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	<input type="checkbox"/> Other Attachments
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
	<input type="checkbox"/> Other Attachments	
<b>Other</b>	<input type="checkbox"/> Non-Standard Form <input type="checkbox"/> Amended <input type="checkbox"/> Post-Deadline Postmark Date	<input checked="" type="checkbox"/> Amended per Objection Original Claim #: <u>10873</u>

Box/Batch: WRPD0023/WRPD0090

Document Number: WRPD004496



Claim No.	State	Date	Document Name	Brief Description	Document Location	Custody
10869	SC	10/1/1972	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan
10869	SC	11/5/1972	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan
10871	SC	5/11/1972	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan
10872	SC	4/23/1972	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan
10873	SC	4/9/1973	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan
10873	SC	3/28/1973	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan
10873	SC	4/2/1973	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan
10873	SC	2/1973	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan
10874	SC	12/3/1970	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan
10874	SC	12/19/1970	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan
10875	SC	7/27/1972	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan
10876	SC	1/1/1972	Invoice	W.R. Grace & Company	100 Oak Street Hampton, SC	Speights & Runyan

WR Grace PD.23.90.4496  
**00016009**  
 SR=946

REC'D MAY 17 2005

911 - 1601

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In Re:	)	Chapter 11
	)	
W. R. Grace & Co., et al. <sup>1</sup> ,	)	Case No. 01-01139 (JKF)
	)	Jointly Administered
Debtors.	)	
	)	
	)	
	)	

**Notice of Supplemental Submission of Certain Speights & Runyan  
Asbestos Property Damage Claims**

Pursuant to the Court's Order Granting Limited Waiver of Del.Bankr.L.R. 3007-1 for the Purpose of Streamlining Objections Pursuant to Certain Claims Filed Pursuant to the Bar Date Order, and the Debtor's Notice of Intent to Object for Materially Insufficient Supporting Information received on March 17, 2005, Speights & Runyan, as the authorized representative of certain claimants, and as class counsel *Anderson Memorial Hospital v. W.*

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Horaco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MICA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Curving, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

REC'D MAY 17 2005

*R. Grace & Co. et al.*, Case No. 92-CP-25-279 (Circuit Court of Hampton County, SC), hereby supplements and/or amends the following claims (listed by claim number) currently pending and submitted pursuant to the Court's Bard Date Order of April 22, 2002: 6620, 6634, 6636, 6636, 6637, 6639, 9912, 9913, 10509, 10511, 10512, 10513, 10514, 10515, 10516, 10517, 10519, 10520, 10521, 10523, 10524, 10528, 10529, 10530, 10531, 10532, 10535, 10536, 10537, 10538, 10539, 10540, 10587, 10588, 10590, 10663, 10664, 10665, 10668, 10669, 10670, 10672, 10673, 10674, 10675, 10679, 10680, 10685, 10689, 10691, 10692, 10694, 10696, 10696, 10697, 10698, 10700, 10701, 10704, 10706, 10707, 10708, 10709, 10711, 10712, 10713, 10717, 10720, 10722, 10723, 10725, 10726, 10727, 10728, 10731, 10732, 10733, 10738, 10744, 10745, 10746, 10747, 10748, 10750, 10751, 10752, 10753, 10754, 10755, 10756, 10757, 10758, 10760, 10761, 10762, 10763, 10765, 10766, 10767, 10768, 10769, 10770, 10771, 10772, 10773, 10774, 10775, 10776, 10777, 10778, 10779, 10781, 10782, 10783, 10784, 10785, 10786, 10787, 10789, 10790, 10791, 10792, 10793, 10794, 10795, 10796, 10797, 10798, 10799, 10800, 10801, 10802, 10804, 10805, 10806, 10807, 10808, 10810, 10834, 10835, 10836, 10837, 10838, 10839, 10840, 10841, 10843, 10844, 10846, 10847, 10849, 10850, 10851, 10852, 10853, 10854, 10855, 10856, 10857, 10858, 10859, 10860, 10861, 10862, 10863, 10864, 10865, 10866, 10867, 10868, 10869, 10871, 10872, 10873, 10874, 10875, 10876, 10877, 10879, 10880, 10881, 10882, 10915, 10916, 10918, 10919, 10923, 10924, 10926, 10927, 10928, 10930, 10943, 10945, 10946, 10947, 10949, 10952, 10955, 10956, 10957, 10958, 10959, 10960, 10961, 10962, 10965, 10966, 10967, 10968, 10969, 10970, 10971, 10972, 10973, 10974, 10975, 10976, 10977, 10978, 10979, 10980, 10981, 10982, 10983, 10984, 10985, 10986, 10989, 10990, 10991, 10992, 10993, 10994, 10995, 10996, 10997, 10998, 10999, 11000, 11001, 11002,

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In response to the Debtor's Objections and the W. R. Grace & Co. Asbestos Property Damage Proof of Claim form subject to the Bar Order, Speights & Runyan have collected and compiled almost twenty thousand (20,000) documents requested by the Debtor in its Proof of Claim form for the above-referenced claims.<sup>2</sup> The documents have been summarized pursuant to the instructions on the W. R. Grace Asbestos Property Damage Proof of Claim form and these summaries have been forwarded to the Debtor and the Debtor's representative. The complete summary is attached hereto as Attachment "B."

By listing these documents for Debtor's review, the claimant's do not intend to waive, and expressly reserve all claims of privilege and confidentiality attendant to those documents upon which such claims are appropriate. Subject to this reservation, these documents are available for inspection by the Debtor or its counsel upon agreement of a review process that protects the claimant's right and ability to assert appropriate privileges and/or confidentiality. The Claimants' further reserve the right to amend or supplement their document summaries as new or different information is located and acquired.

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<sup>2</sup> The claim numbers and associated building locations are listed in Attachment "A" to this Notice.

Respectfully Submitted,

Daniel A. Speights  
Marion C. Fairey, Jr.  
SPEIGHTS & RUNYAN  
200 Jackson Avenue, East  
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Hampton, South Carolina 29924  
Telephone: (803) 943-4444  
Facsimile: (803) 943-4599

By: 

May 16, 2005  
Hampton, South Carolina



**SPEIGHTS & RUNYAN**  
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MARION C. FAIREY, JR.

May 16, 2005

**Via Facsimile and UPS Overnight**

Joseph S. Nacca  
KIRKLAND & ELLIS LLP  
200 East Randolph Drive  
Chicago, Illinois 60601-6636

Rust Consulting, Inc.  
Claims Processing Agent  
Re: W.R. Grace and Co. (Supplemental Information)  
201 South Lyndale Avenue  
Faribault, Minnesota 55021

Re: **W.R. Grace & Company, et al**  
**Bankruptcy Case No. 01-01139 (JKF)**  
**(Supplemental Information)**

**Claim Nos.: 6620, 6634, 6636, 6636, 6637, 6639, 9912, 9913, 10509,**  
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Rust Consulting, Inc.  
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12594, 12616, 13950 and 14885.

Dear Counsel and Claims Processing Agent:

Enclosed please find the Notice of Supplemental Submission of Certain Speights & Runyan Asbestos Property Damage Claims with attached document summaries. Subject to this Notice, whose voluminous attachments are being sent via overnight mail as instructed, are intended to supplement 1,143 (one thousand one-hundred forty-three) claims identified in the Notice in "Attachment A." The documents identified in the summary are available for inspection as set forth in the Notice at such time as may be mutually acceptable to the Claimants and the Debtor.

When making arrangements to view the documents, please contact me at (803) 943-4444.

If you have any questions or concerns, please do not hesitate to give me a call. Please accept my kindest regards

Sincerely,

  
Marion C. Fahey, Jr.

MCF/smh  
Enclosure

**EXHIBIT L**

03/08/2005

12:27

U.S. BANKRUPTCY &amp; NANCY

NO. 086

002

## IN THE UNITED STATES BANKRUPTCY COURT

## FOR THE DISTRICT OF DELAWARE

In re:

Chapter 11

FEDERAL-MOGUL GLOBAL INC.,

Case No. 01-10578 (RTL).

T&N LIMITED, et al.,<sup>1</sup>

(Jointly Administered)

Debtors.

[Related Docket Nos. 2951 + 3095]

**ORDER APPROVING STIPULATION WITHDRAWING (i) CERTAIN CLAIMS  
FILED BY THE LAW FIRM OF SPEIGHTS & RUNYAN AND  
(ii) THE DEBTORS' PROCEDURAL OBJECTIONS TO CERTAIN  
OTHER CLAIMS FILED BY SPEIGHTS & RUNYAN**

Upon consideration of the *Stipulation Withdrawing (i) Certain Claims Filed By*

*The Law Firm Of Speights & Runyan And (ii) The Debtors' Procedural Objections To Certain*

<sup>1</sup> The U.S. Debtors are Carter Automotive Company, Inc., Federal-Mogul Corporation, Federal-Mogul Dutch Holdings Inc., Federal-Mogul FX, Inc., Federal-Mogul Global Inc., Federal-Mogul Global Properties, Inc., Federal-Mogul Ignition Company, Federal-Mogul Mfg. Inc., Federal-Mogul Pistons Rings, Inc., Federal-Mogul Powertrain, Inc., Federal-Mogul Products, Inc., Federal-Mogul Puerto Rico, Inc., Federal-Mogul T&N-Way, Inc., Federal-Mogul U.K. Holdings, Inc., Federal-Mogul Ventures Corporation, Federal-Mogul World Wide, Inc., F&F Products Manufacturing Co., F&F International LLC, Ferodo America, Inc., Gasket Holdings Inc., I.W.F. Holdings, Inc., McCord Sealing, Inc., and T&N Industries Inc.

The English Debtors are AE Dayton Services Limited, AE Group Machines Limited, AE Holdings Limited, AE International Limited, AE Limited, AE Piston Products Limited, AE Sales (Africa) Limited, Acropine & Motor Automation Castings Limited, Amber Supervision Limited, Ardennes Road Services Limited, Associated Engineering Group Limited, Avicourt Limited, Bearings (North-Western) Limited, Brake Linings Limited, Colvan Rubber Co. Limited, Cowart 100 Limited, Cozmid Limited, Crutahd Limited, Dealings Limited, Dampington Services Limited, Dams Limited, B.W. Engineering Limited, Edwards, Walker & Co. Limited, Engineering Components Limited, Federal-Mogul Acquisition Company Limited, Federal-Mogul Aftermarket UK Limited, Federal-Mogul Bradford Limited, Federal-Mogul Brake Systems Limited, Federal-Mogul Bridgewater Limited, Federal-Mogul Capstan Castings Limited, Federal-Mogul Camshafts Limited, Federal-Mogul Engineering Limited, Federal-Mogul EuroStiction Limited, Federal-Mogul Export Services Limited, Federal-Mogul Friction Products Limited, Federal-Mogul Global Growth Limited, Federal-Mogul Ignition (U.K.) Limited, Federal-Mogul Powertrain Systems International Limited, Federal-Mogul Sealing Systems (Canada) Limited, Federal-Mogul Sealing Systems (Rockdale) Limited, Federal-Mogul Sealing Systems (Slough) Limited, Federal-Mogul Sealing Systems Limited, Federal-Mogul Shoreham Limited, Federal-Mogul Standard Products Limited, Federal-Mogul Systems Protection Group Limited, Federal-Mogul Technology Limited, Federal-Mogul U.K. Limited, Ferodo Castorion Limited, Ferodo Limited, FHE Technology Limited, Fleetside Investments Limited, F&M UK Holding Limited, FP Diesel Limited, Precision Materials Limited, G.B. Tools & Components Export Limited, Gearshape Limited, Orca Limited, Halls Gaskets Limited, Hepworth & Grandage Limited, High Precision Equipment Limited, Inbrot Limited, Isotamwonder Limited, I.W. Roberts Limited, Kings Park Bowring Limited, Labson Limited, Launch Limited, Lamo Precision Equipment Limited, Leeds Piston Ring & Engineering Co. Limited, M.T.A. (Kennerly) Limited, Mason Engineering Co. Limited, Mobile Distributing (Spares) Limited, Moors Plastic Units Limited, Newalls Insulation Company Limited, Onall Limited, Payco (Europe) Limited, Pezel Limited, Presswork-Components Limited, Stradon Limited, Sverreback Limited, Specialoid Limited, STS (1996) Limited, TAP International Limited, T&N Holdings Limited, T&N International Limited, T&N Investments Limited, T&N Limited, T&N Materials Research Limited, T&N Piston Products Group Limited, T&N Properties Limited, T&N Shelf Eight Limited, T&N Shelf Blighams Limited, T&N Shelf Fikera Limited, T&N Shelf Five Limited, T&N Shelf Four Limited, T&N Shelf Fourteen Limited, T&N Shelf Nine Limited, T&N Shelf Nineteen Limited, T&N Shelf One Limited, T&N Shelf Seven Limited, T&N Shelf Six Limited, T&N Shelf Sixteen Limited, T&N Shelf Ten Limited, T&N Shelf Thirteen Limited, T&N Shelf Thirty Limited, T&N Shelf Thirty-One Limited, T&N Shelf Thirty-Two Limited, T&N Shelf Thirty-Three Limited, T&N Shelf Thirty-Four Limited, T&N Shelf Twenty-Five Limited, T&N Shelf Twenty-Six Limited, T&N Shelf Twenty-Seven Limited, T&N Shelf Twenty-Eight Limited, T&N Shelf Twenty-Nine Limited, T&N Shelf Twenty-One Limited, T&N Shelf Twenty-Two Limited, T&N Shelf Two Limited, T&N Trade Marks Limited, T&N Welfare Trust Limited, TBA Betting Limited, TBA Betting (Resident) Limited, TBA Industrial Products Limited, Telford Rubber Processors Limited, Telford Technology Supplies Limited, The British Piston Ring Company Limited, The Washington Chemical Company Limited, Tibbo Limited, Touchdown Adhesive Products Limited, Turner & Newall Limited, Turner Brothers Asbestos Company Limited, Tynda Limited, Vanwall Cars Limited, Wellworthy Limited, Wellworthy Property Developments Limited, and William C. Jones (Polymers) Limited. Unlike all the other English Debtors, T&N Investments Limited is a Scottish rather than English company and has commenced administration proceedings in Scotland rather than England in 2002.

03/08/2005 12:27 U.S. BANKRUPTCY # NANCY

NO. 006 003

*Other Claims Filed By Speights & Runyan* (the "Stipulation"), attached hereto as Exhibit 1, and good cause appearing therefore,

IT IS HEREBY ORDERED THAT the Stipulation is approved; and it is further

ORDERED that the 1228 claims listed on Exhibit A to the Stipulation (the "Withdrawn Claims") are withdrawn with prejudice; and it is further

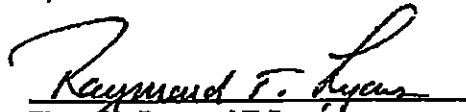
ORDERED that any votes to accept or reject the Debtors' plan of reorganization submitted in connection with the Withdrawn Claims are void and shall not be considered for the purposes of determining acceptance or rejection of the Debtors' plan of reorganization or for any other purpose; and it is further

ORDERED that the Objections (as defined in the Stipulation) are withdrawn without prejudice with respect to the 1687 claims listed on Exhibit B to the Stipulation (the "Other Claims"); and it is further

ORDERED that the Debtors' rights to raise further objections to the Other Claims on any grounds are expressly reserved and preserved; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or relating to this order.

Dated: March 8, 2005

  
Honorable Raymond T. Lyons  
United States Bankruptcy Court Judge

**EXHIBIT M**



**EXHIBIT M**

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	
W. R. GRACE & CO., et al.	)	Chapter 11
	)	
Debtors.	)	Case No. 01-01139 (JKF)
	)	(Jointly Administered)

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Related to Docket No. \_\_\_\_\_

**ORDER REGARDING DEBTORS' TWELFTH OMNIBUS OBJECTION TO CLAIMS  
(NON-SUBSTANTIVE) DISALLOWING CERTAIN CLAIMS FILED BY THE LAW  
FIRM OF SPEIGHTS & RUNYAN**

This matter coming before the Court on the *Debtors' Twelfth Omnibus Objection (Non-Substantive) to Certain Claims Filed by the Law Firm of Speights & Runyan* (the "Motion"); the Court having reviewed and considered the Motion; the Court finding that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(A) and (O); and (iii) no further notice or hearing on the Motion being required:

IT IS HEREBY ORDERED THAT each of the Unauthorized Claims (as defined in the Motion) is hereby disallowed, with prejudice.

Wilmington, Delaware

Dated: \_\_\_\_\_, 2005

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT N**

Janet  
Baer/Chicago/Kirkland-Elms  
06/17/2005 01:03 PM

To "Samuel Blatnick" <Sblatnick@kirkland.com>  
cc  
bcc  
Subject Fw: Grace Ch. 11--Duplicate Claims

----- Original Message -----

From: Richard.Finke  
Sent: 06/17/2005 12:34 PM  
To: jbaer@kirkland.com; mbrowdy@kirkland.com  
Subject: FW: Grace Ch. 11--Duplicate Claims

As per my prior e-mail. This will be the first of three.

-----Original Message-----

From: Finke, Richard  
Sent: Friday, February 18, 2005 1:58 PM  
To: Daniel Speights (E-mail)  
Cc: Beber, Robert H.  
Subject: Grace Ch. 11--Duplicate Claims

Mr. Speights:

You may recall our discussion on Wednesday when I advised you that I am aware of at least two situations where Speights & Runyan filed asbestos property damage claims for properties that are also the subject of claims filed by the owners of the properties. The following is the claim information relating to those two situations:

3250 Euclid Avenue, Cleveland, Ohio	Claim No. 2785--filed by Building Laborers Union
Local 310 (current owner)	Claim No. 11591--filed by Speights & Runyan
101 Ash Street, San Diego, California	Claim No. 9776--filed by Shapery Developers Gas &
Electric Property LP (current	owner)
	Claim No. 10922--filed by Speights & Runyan
	Claim No. 11308--filed by Semptra Energy, San Diego
Gas & Electric, and Enova and current tenants)	(former owners)

In light of the apparently duplicative nature of Claim Nos. 11591 and 10922, Grace requests that Speights & Runyan withdraw those claims.

Thank you for your consideration of this request.

Richard C. Finke

**EXHIBIT O**

Janet  
Baer/Chicago/Kirkland-Ellis  
06/17/2005 01:02 PM

To "Samuel Blatnick" <Sblatnick@kirkland.com>  
cc  
bcc  
Subject Fw: S&R PD Claims--2019 Statement

----- Original Message -----

From: Richard.Finke  
Sent: 06/17/2005 12:34 PM  
To: jbaer@kirkland.com; mbrowdy@kirkland.com  
Subject: FW: S&R PD Claims--2019 Statement

The second of three.

-----Original Message-----

From: Finke, Richard  
Sent: Thursday, February 24, 2005 3:36 PM  
To: Daniel Speights (E-mail)  
Subject: FW: S&R PD Claims--2019 Statement

Mr. Speights:

During our February 16 meeting I indicated that Grace had identified a number of claims that were filed by your firm on behalf of claimants it did not appear to represent. Attached please find a list of 168 claims filed in Grace's Ch. 11 proceedings by Speights & Runyan on behalf of claimants that are not included in your firm's 2019 statement. Grace interprets these omissions as evidence either that your firm lacked the requisite authorization to file those claims on behalf of the named claimants, or that the 2019 statement is incomplete. Grace therefore requests that, as part of the proposed stipulation we discussed on February 16, Speights & Runyan agree to withdraw claims on the attached list to the extent they were not authorized by the claimants named therein. In addition, Grace requests that Speights & Runyan supplement its 2019 statement if and to the extent one or more claimants was erroneously omitted from that statement.

To the extent the listed claims are not withdrawn and/or were not filed on behalf of claimants included in a proper 2019 statement, Grace reserves the right to seek dismissal of the claims by the bankruptcy court and any other appropriate relief.

Richard C. Finke  
Senior Litigation Counsel  
W.R. Grace & Co.



NotonSpeights2019Lst2-18.xls

**EXHIBIT P**



Janet  
Baer/Chicago/Kirkland-Ellis  
06/17/2005 01:02 PM

To "Samuel Blatnick" <Sblatnick@kirkland.com>  
cc  
bcc  
Subject Fw: Speight & Runyan Claims

----- Original Message -----

From: Richard.Finke  
Sent: 06/17/2005 12:35 PM  
To: jbaer@kirkland.com; mbrowdy@kirkland.com  
Subject: FW: Speight & Runyan Claims

Third of three.

-----Original Message-----

From: Finke, Richard  
Sent: Monday, March 07, 2005 2:12 PM  
To: Daniel Speights (E-mail)  
Cc: Beber, Robert H.; Siegel, David  
Subject: FW: Speight & Runyan Claims

Mr. Speights:

As we discussed generally last Monday, I am forwarding for your consideration the attached list of 374 claims filed by your firm. The Debtors in Grace's Ch. 11 proceedings hereby request that Speights & Runyan withdraw each of the 374 claims on the grounds that they lack certain fundamental prerequisites of asbestos property damage claims in this bankruptcy. Specifically, the claims contain one or more of the following deficiencies:

(1) the claims were filed on behalf of buildings or construction job sites, not on behalf of persons or entities with legally cognizable interests in the properties in question such as would give them standing to assert the claims;

(2) the claims were filed on behalf of construction companies, building supply stores, paint and plastering contractors, and other similar businesses that may have purchased Grace products but lack any legally cognizable interests in the properties in question such as would give them standing to assert the claims;

(3) the claims lack street addresses (and in a few cases, city addresses).

To the extent the claims identified on the attachment are not withdrawn, Grace reserves the right to seek dismissal of the claims by the bankruptcy court and any other appropriate relief.

By providing the attached list at this time, I do not believe there is a need for us to meet in Miami on Wednesday, as we had discussed. Let me know if you disagree.

Richard C. Finke

**EXHIBIT Q**

CF  
Grace

**KIRKLAND & ELLIS LLP**  
AND AFFILIATED PARTNERSHIPS

200 East Randolph Drive  
Chicago, Illinois 60601

John Donley  
To Call Writer Directly:  
312 861-2068  
jdonley@kirkland.com

312 861-2000  
www.kirkland.com

Facsimile:  
312 861-2200

May 27, 2005

Daniel A. Speights  
Amanda G. Steinmeyer  
Speights & Runyan  
Attorneys at Law  
200 Jackson Avenue East  
Hampton, South Carolina 29924

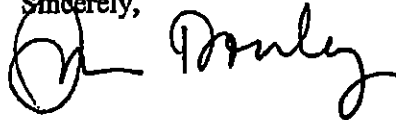
Dear Mr. Speights:

We have been reviewing the several thousand asbestos property-damage proofs of claim filed by your firm against the W. R. Grace & Co. bankruptcy estates, and it appears that your firm may not represent many of the claimants. Many of the claims are filed on behalf of buildings or projects, not actual claimants. The fact that the forms were signed by a lawyer from your firm, and not the claimant as required, further suggests that your firm may not actually represent these claimants.

To avoid the effort of investigating thousands of claims, we have identified the attached list of claims as a first step. With regard to these claims, we would appreciate if you could send us documentation that your firm actually represents these clients. We expect that such documentation would be readily available and not voluminous and would be grateful if you could provide it to us within a week. We may need to pursue this matter further through formal discovery if our informal communications on this matter are not sufficient.

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions.

Sincerely,



John Donley

**KIRKLAND & ELLIS LLP**

**Daniel A. Speights**  
**May 27, 2005**  
**Page 2**

**JD/lic**

**cc: Richard Finke**  
**Janet S. Baer**

**Exhibit A**

<b>Claim Number(s)</b>	<b>Claimant</b>
6874	M&T Banks
10833	Ahmanson Center
10973	"Hospital," Petaluma, CA
11125	"Hospital," Carroll, IA
10834	McCrary Summwalt Construction Co.
10852	Frank Ulmer Lumber Co.
10924	Smith Plastering,
10928	Woodcock Plastering
11154	Stadium in Storm Lake, Sioux City, IA
10768	Woodman Tower Building
11556	Montgomery Ward-Randhurst Shopping Center
11557	Mid Continent Building
11086	Zoo Job, Little Rock, AK
11413	Dale Spicer-Hospital Job, Kanawha City, WV
11179	Investment Tower Job, Cleveland
11420	Moran Job, Market Street, Seattle
10770, 10771 and 10772	Bowery Savings Bank
6643	W.C. Froelich Inc.
10773	Leonard's Hospital
6726	"Harvard Public Health (Harv Vanguard Med. Asso"
6661	American Medical Association Building
6672	Employer's Mutual Job